



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



HEALTHY AIR LIVING™

JUN 11 2012

Jeff Randel
ConocoPhillips Pipeline Co.
1441 Wade Avenue
Taft, CA 93268

**Re: Notice of Preliminary Decision - Federally Mandated Operating Permit
District Facility # S-1525
Project # S-1112148**

Dear Mr. Randel:

Enclosed for your review and comment is the District's analysis of ConocoPhillips' application for the Federally Mandated Operating Permit for its pipeline facility located at the Midway Pump Station at 1441 Wade Avenue in Taft, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,

A handwritten signature in black ink, appearing to read "David Warner", with a long horizontal flourish extending to the right.

David Warner
Director of Permit Services

DW AD/cm

Attachments



JUN 11 2012

Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

**Re: Notice of Preliminary Decision - Federally Mandated Operating Permit
District Facility # S-1525
Project # S-1112148**

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of ConocoPhillips' application for the Federally Mandated Operating Permit for its pipeline facility located at the Midway Pump Station at 1441 Wade Avenue in Taft, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 45-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,



David Warner
Director of Permit Services

DW: AD/cm

Attachments



JUN 11 2012

Mike Tollstrup, Chief
Project Assessment Branch
Air Resources Board
P O Box 2815
Sacramento, CA 95812-2815

**Re: Notice of Preliminary Decision - Federally Mandated Operating Permit
District Facility # S-1525
Project # S-1112148**

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of ConocoPhillips' application for the Federally Mandated Operating Permit for its pipeline facility located at the Midway Pump Station at 1441 Wade Avenue in Taft, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,



David Warner
Director of Permit Services

DW: AD/cm

Attachments

Bakersfield Californian

**NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED ISSUANCE OF
FEDERALLY MANDATED OPERATING PERMITS**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed issuance of the Federally Mandated Operating permits to ConocoPhillips Pipeline Co. for its pipeline facility located at the Midway Pump Station at 1441 Wade Avenue in Taft, California.

The District's analysis of the legal and factual basis for this proposed action, project #S-1112148, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. There are no emission changes associated with this proposed action. This will be the public's only opportunity to comment on the specific conditions of the proposed Federally Mandated Operating initial permits. If requested by the public, the District will hold a public hearing regarding issuance of this initial permit. For additional information, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500. Written comments on the proposed initial permit must be submitted within 30 days of the publication date of this notice to DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 34946 FLYOVER COURT, BAKERSFIELD, CALIFORNIA 93308.

**SAN JOAQUIN VALLEY
UNIFIED AIR POLLUTION CONTROL DISTRICT**

*ConocoPhillips Pipeline Company
Facility #S-1525*

**INITIAL TITLE V PERMIT
PROPOSED ENGINEERING EVALUATION
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INITIAL TITLE V APPLICATION REVIEW

Project #: S-1112148
Deemed Complete: June 6, 2011

Engineer: Ashley Dahlstrom
Date: April 16, 2012

Facility Number: S-1525
Facility Name: ConocoPhillips Pipeline Company
Mailing Address: 1441 Wade Avenue
Taft, CA 93268

Contact Name: Jim Adams
Phone: (562) 290-1516

Responsible Official: Jeff Randel
Title: Division Manager

I. PROPOSAL

ConocoPhillips Pipeline Company is proposing that an initial Title V permit be issued for its existing Midway Pump Station in Taft, CA. The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with those applicable requirements, and to provide the legal and factual basis for proposed permit conditions.

II. FACILITY LOCATION

ConocoPhillips Pipeline Company's Midway Pump Station is located at 1441 Wade Avenue in Taft, CA.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is shown in Attachment A.

A summary of the exempt equipment categories which describe the insignificant activities or equipment at the facility not requiring a permit is shown in Attachment B. This equipment is not exempt from facility-wide requirements.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant has requested to utilize template #SJV-UM-0-3, Facility-Wide Umbrella General Permit Template, for unit S-1525-0-2. Based on the information submitted on the Template Qualification Form, the applicant qualifies for the use of this template.

V. SCOPE OF EPA AND PUBLIC REVIEW

Certain segments of the proposed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

The following permit conditions, including their underlying applicable requirements, originate from model general permit templates and are not subject to further EPA or public review:

- Conditions 1 through 40 on facility wide requirements S-1525-0-2.

VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES

District Rule 1100, Equipment Breakdown (amended December 17, 1992) (Non-SIP replacement for Kern County Rule 111)

District Rule 1160, Emission Statements (adopted November 18, 1992)

District Rule 2010, Permits Required (amended December 17, 1992)

District Rule 2020, Exemptions (amended August 18, 2011)

District Rule 2031, Transfer of Permits (amended December 17, 1992)

District Rule 2040, Applications (amended December 17, 1992)

District Rule 2070, Standards for Granting Applications (amended December 17, 1992)

District Rule 2080, Conditional Approval (amended December 17, 1992)

District Rule 2520, Federally Mandated Operating Permits, Sections 5.2, 9.1.1, 9.4, 9.5, 9.7, 9.8, 9.9, 9.13.1, 9.13.2, 9.16, and 10.0 (amended June 21, 2001)

District Rule 4101, Visible Emissions (amended February 17, 2005)

District Rule 4601, Architectural Coatings (amended December 17, 2009)

District Rule 8021, Construction, Demolition Excavation, Extraction, and Other Earthmoving Activities (amended August 19, 2004)

District Rule 8031, Bulk Materials (amended August 19, 2004)

District Rule 8041, Carryout and Trackout (amended August 19, 2004)

District Rule 8051, Open Areas (amended August 19, 2004)

District Rule 8061, Paved and Unpaved Roads (amended August 19, 2004)

District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas (amended September 16, 2004)

40 CFR Part 82, Subpart B and F, Stratospheric Ozone

40 CFR Part 61, Subpart M, National Emissions Standard for Asbestos

VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES

District Rule 1081, Source Sampling (amended December 17, 1992)

District Rule 2201, New and Modified Stationary Source Review Rule (amended April 21, 2011)

District Rule 2520, Federally Mandate Operating Permits (amended June 21, 2001)

District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)

District Rule 4623, Storage of Organic Liquids (amended May 19, 2005)

District Rule 4701, Internal Combustions Engines – Phase 1 (amended August 21, 2003)

District Rule 4702, Internal Combustion Engines (amended August 18, 2011)

District Rule 4801, Sulfur Compounds (amended December 17, 1992) (Non-SIP replacement for Kern County Rule 407)

40 CFR Part 60, Subpart K, Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification commenced after June 11, 1973, and Prior to May 19, 1978

40 CFR Part 60, Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification commenced after May 18, 1978, and Prior to July 23, 1984

40 CFR Part 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification commenced after July 23, 1984

40 CFR Part 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

40 CFR Part 64, Compliance Assurance Monitoring

VIII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as Federally Enforceable Through Title V Permit.

This facility is subject to the following rules that are not currently federally enforceable:

District Rule 4102, Nuisance (amended December 17, 1992)

For this facility, condition 41 of the requirements for the facility-wide permit S-1525-0-2 is based on District Rule 4102 and is not Federally Enforceable through Title V. Condition 41 of the requirements for the facility-wide permit comply with the requirements of this rule.

IX. COMPLIANCE

A. Requirements Addressed by Model General Permit Templates

The applicant is proposing to use a general permit template to address federally applicable facility-wide requirements. Section IV of template SJV-UM-0-3 includes a demonstration of compliance for all applicable requirements. Template conditions have been added to the facility wide requirements as condition numbers 1 through 40 to assure compliance with these requirements.

B. Requirements Not Addressed by Model General Permit Templates

1. District Rule 1081, Source Sampling

The purpose of this rule is to ensure that any source operation which emits or may emit air contaminants provides adequate and safe facilities for use in sampling to determine compliance. This rule also specifies methods and procedures for source testing, sample collection, and compliance determination.

a. 199 bhp Natural Gas-Fired IC Engine (S-1525-4-4)

- Conditions 11 through 13 comply with the requirements of this rule.

2. District Rule 2201, New and Modified Stationary Source Review Rule (District NSR Rule)

The permit units were subject to the District NSR Rule upon application for Authority to Construct (ATC). In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

a. 55,000 bbl Fixed Roof Petroleum Storage Tank (S-1525-1-6)

- Conditions 1 and 8 comply with the requirements of this rule.

b. 199 bhp Natural Gas-Fired IC Engine (S-1525-4-4)

- Conditions 4 and 5 comply with the requirements of this rule.

3. District Rule 2520, Federally Mandated Operating Permits

Section 9.3.2 specifies the monitoring requirements for permits where the applicable requirements do not require periodic testing or monitoring. The monitoring requirements assure use of terms, test methods, units, averaging periods, and other statistical conventions. Recordkeeping requirements may be sufficient to meet the requirements of this section.

a. 199 bhp Natural Gas-Fired IC Engine (S-1525-4-4)

- Conditions 6 through 8 comply with the requirements of this rule.

There are no federally applicable Greenhouse Gas (GHG) requirements for this source. It should be noted that the Mandatory Greenhouse Gas Reporting rule (40CFR Part 98) is not included in the definition of an applicable requirement within Title V (per 40CFR 71.2). Therefore, there will be no further discussion of GHG in this evaluation.

4. District Rule 4201, Particulate Matter Concentration

The purpose of this rule is to protect the ambient air quality by establishing a particulate emission standard. Pursuant to Section 3.0, a person shall not release or discharge into the atmosphere from any single source operation, dust, fumes, or total suspended particulate matter emissions in excess of 0.1 grain per cubic foot of gas at dry standard conditions.

Internal Combustion (IC) Engines

The following analysis shows that internal combustion (IC) engines are in compliance with this particulate matter (PM) emission limit.

The expected concentration of PM emitted from a natural gas-fired IC engine is shown by the following analysis:

$$\left(\frac{0.019 \text{ lb} - \text{PM}}{10^6 \text{ Btu}} \right) \times \left(\frac{7,000 \text{ grains}}{\text{lb}} \right) \times \left(\frac{10^6 \text{ Btu}}{8,710 \text{ dscf}} \right) = 0.015 \frac{\text{grain}}{\text{dscf}}$$

Where:

$$\left(\frac{0.019 \text{ lb} - \text{PM}}{10^6 \text{ Btu}} \right) = \text{filterable \& condensable PM (AP-42, 7/00, Table 3.2-3)}$$

$$\left(\frac{10^6 \text{ Btu}}{8,710 \text{ dscf}} \right) = \text{F-factor (40 CFR Part 60, Appendix A-7, Table 19-2)}$$

The preceding analysis demonstrates that IC engines firing on natural gas will be in compliance with the PM limits of this rule.

- a. 199 bhp Natural Gas-Fired IC Engine (S-1525-4-4)
 - Condition 1 complies with the requirements of this rule.

5. District Rule 4623, Storage of Organic Liquids

The purpose of this rule is to limit volatile organic compound (VOC) emissions from the storage of organic liquids. This rule applies to any tank with a capacity of 1,100 gallons or greater in which any organic liquid is placed, held, or stored.

Section 4.4 states that tanks exclusively receiving and/or storing an organic liquid with a TVP less than 0.5 psia are exempt from all other requirements of the rule except for complying with the TVP and API gravity testing provisions of Section 6.2, the recordkeeping provisions of Section 6.3.6, and the test methods of Section 6.4.

Section 6.2 requires initial and periodic TVP and API gravity testing of each uncontrolled fixed roof tank.

Section 6.2.1.2 requires TVP testing to be conducted at actual storage temperature. Additionally, this section requires API gravity testing of tanks storing crude oil or petroleum distillates.

Section 6.2.2 requires TVP testing of each uncontrolled fixed roof tank at least once every 24 months during summer (July – September), and/or whenever there is a change in the source or type of organic liquid stored in each tank.

Section 6.3 requires operators to retain accurate records for a period of at least five years and make such records available to the APCO upon request.

Section 6.3.6 requires operators to submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing.

Section 6.4 lists the test methods approved by the APCO and EPA.

- a. 55,000 bbl Fixed Roof Petroleum Storage Tank (S-1525-1-6)
 - Conditions 2 through 7 and condition 9 comply with the requirements of this rule.

6. District Rule 4701, Internal Combustion Engines – Phase 1

The purpose of this rule is to limit the emissions of nitrogen oxides (NO_x), carbon monoxide (CO), and volatile organic compounds (VOC) from internal combustion engines. Except as provided in Section 4.0, the

provisions of this rule apply to any internal combustion engine, rated greater than 50 bhp that requires a Permit to Operate (PTO).

There is one (1) natural gas-fired IC engine involved with this project. Pursuant to Section 2.0 of Rule 4701, this engine is subject to District Rule 4701 – *Internal Combustion Engines – Phase 1*. In addition, this engine is also subject to District Rule 4702 – *Internal Combustion Engines*.

Since the emission limits of District Rule 4702 and all other requirements are equivalent or more stringent than District Rule 4701 requirements, compliance with Rule 4702 requirements will satisfy the requirements of Rule 4701. No further discussion is required.

7. District Rule 4702, Internal Combustion Engines

The SIP approved version of Rule 4702 are is the version amended on 1/18/07. Rule 4702 was amended on 8/18/11, however, these amendments have not yet been approved into the SIP.

The 8/19/11 amendments established more stringent NO_x emission limits and impose fuel sulfur requirements for non-agricultural operation spark ignited IC engines. Compliance with these requirements is phased in beginning in 2014.

Therefore, compliance with the currently applicable requirements of 8/18/11 amendments demonstrates compliance with the requirements of the SIP approved version of Rule 4702.

The purpose of this rule is to limit the emissions of nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), and sulfur oxides (SO_x) from internal combustion engines. This rule applies to any internal combustion (IC) engine rated at 25 brake horsepower (bhp) or greater.

Section 5.2.1 requires operators of non-agricultural operations (non-AO) spark-ignited IC engines rated greater than 50 bhp to comply with the emissions limits in Table 1 until the engine demonstrates compliance with Table 2 emission limits pursuant to the compliance schedule in Section 7.5. Section 7.5.1 requires operators with a single engine at a stationary source to be in full compliance with the Table 2 emission limits by January 1, 2014. Since the compliance date has not passed, Table 2 emission limits are not applicable to this project.

Section 5.7 requires operators of non-AO spark-ignited engines to comply with the sulfur oxides (SOx) emission control requirements on and after the compliance schedule specified in Section 7.5. As stated above, Section 7.5.1 requires operators with a single engine at a stationary source to be in full compliance with the SOx control requirements of Section 5.7 by January 1, 2014. Since the compliance date has not passed, the SOx control requirements of Section 5.7 are not applicable to this project.

Section 5.8.1 requires operators of an engine rated at 1,000 bhp or greater and permitted to operate more than 2,000 hours per calendar year or an engine with an external emission control device to install, operate, and maintain continuous monitoring equipment for NOx, CO, and oxygen or install, operate, and maintain APCO-approved alternate monitoring. The facility has chosen to meet a pre-approved alternate emission monitoring plan that includes periodic monitoring of NOx, CO, and oxygen concentrations. Pursuant to District Policy SSP 1810 (4/29/04), periodic monitoring must be performed at least once per calendar quarter in which a source test is not performed.

Section 5.8.6 requires operators to install and operate a non-resettable elapsed time meter for each engine.

Section 5.8.7 requires operators to implement the submitted and APCO approved Inspection & Maintenance (I&M) plan for each engine, pursuant to Section 6.5.

Section 5.8.8 requires operators to collect data through the I&M plan in a form approved by the APCO for each engine.

Section 5.8.9 requires operators to use a portable NOx analyzer to take NOx emission readings to verify compliance with the emission requirements of Section 5.2 during each calendar quarter in which a source test is not performed for each engine. The facility has implemented an I&M plan which requires periodic monitoring of NOx emissions. Section 5.8.9.2 requires emission readings to be taken with the engine operating at conditions representative of normal operations. Section 5.8.9.3 requires the analyzer to be calibrated, maintained, and operated in accordance with the manufacturer's specifications. Section 5.8.9.5 sets the sampling period for NOx emission readings.

Section 5.10 requires operators of non-AO engines to comply with the SOx emissions monitoring requirements on and after the compliance schedule specified in Section 7.5. As stated above, Section 7.5.1 requires operators with a single engine at a stationary source to be in full compliance with the SOx emissions monitoring requirements of Section

5.10 by January 1, 2014. Since the compliance date has not passed, the SOx emissions monitoring requirements of Section 5.10 are not applicable to this project.

Section 6.2.1 requires operators of engines subject to the requirements of Section 5.2 to maintain an engine operating log and retain these records for a period of at least five years.

Section 6.2.2 requires operators to retain the data collected pursuant to the requirements of Sections 5.8 and 5.9 for a period of at least five years.

Section 6.3.1.1 requires engines that have been retrofitted with an exhaust control device to comply with the requirements of Sections 6.3.2 through 6.3.4.

Section 6.3.2.1 requires operators to demonstrate compliance with the applicable limits at least once every 24 months.

Section 6.3.3 requires operators to conduct emissions source testing with the engine operating at conditions representative of normal or conditions specified in the Permit to Operate. This section also specifies the requirements for test runs.

Section 6.4 lists the EPA and APCO approved test methods for demonstrating compliance with Section 5.2.

Section 6.5.1.1 requires engines that have been retrofitted with an exhaust control device to comply with the Inspection & Monitoring (I&M) requirements of Sections 6.5.2 through 6.5.9.

a. 199 bhp Natural Gas-Fired IC Engine (S-1525-4-4)

- Conditions 2 through 4, 9 through 10, and 14 through 22 comply with the requirements of this rule.

8. District Rule 4801, Sulfur Compounds

The purpose of this rule is to limit the emissions of sulfur compounds. A maximum concentration and test method are specified.

Sections 3.1 and 3.2 specify the emission limits and the test methods used to determine such emissions. District Rule 4801 has been submitted to the EPA to replace Kern County Rule 407 but is not SIP approved.

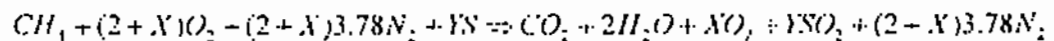
District Rule 4801 is at least as stringent as Kern County Rule 407, as demonstrated in the table below:

REQUIREMENTS	District Rule 4801	Kern County Rule 407
A person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: two-tenths (0.2) percent by volume calculated as sulfur dioxide (SO ₂), on a dry basis averaged over 15 consecutive minutes	X	X
EPA Method 8 and ARB Method 1-100 (Continuous Emission Stack Sampling) shall be used to determine such emissions	X	

Natural Gas-Fired Internal Combustion (IC) Engine

Gas firing units at this facility are limited to the combustion of PUC-quality natural gas with a sulfur content of less than or equal to 0.017% by weight. The following demonstration illustrates, by stoichiometric mass balance taking CH₄ as typical for natural gas, that the proposed limitation is more stringent than either District Rule 4801 or Kern County Rule 407.

The combustion equation for natural gas (neglecting NO_x and SO_x relative to O₂ in the exhaust) is:



Where:

Y = moles of sulfur in fuel

X = moles of excess air

Solving the expression for the fraction of O₂ in the exhaust by volume gives:

$$\frac{X}{3 + X + (2 + X)3.78} = 0.04 \Rightarrow X = 0.523$$

Where:

X = moles of excess air
3 = combined total of moles of CO₂ and H₂O in the exhaust
0.04 = fraction of O₂ in the exhaust by volume

Solving the expression for the fraction of SO₂ in the dry exhaust by volume gives:

$$\frac{Y}{1 + 0.523 + 9.54} = 0.002 \Rightarrow Y = 0.022$$

Where:

Y = mole fraction of S per mole of CH₄ combusted
1 = moles of CO₂ in the exhaust
9.54 = moles of N₂ in the exhaust
0.002 = 2,000 ppmv SO_x emission limit

Using Y to calculate the weight fraction of S in one mole of CH₄:

$$\frac{(0.022)(32.06)}{16.04 + (0.022)(32.06)} = 0.042 = 4.2\% \text{ S by weight in the fuel}$$

Where:

32.06 = molecular weight of sulfur (S)
16.04 = molecular weight of CH₄
0.042 = fraction of S by weight in the fuel

Natural gas with a sulfur content of less than 4.2% by weight will satisfy Kern County Rule 407 and District Rule 4801.

The engine in this project is allowed by permit condition to burn only PUC-quality natural gas with a sulfur content of 0.017% by weight, which is less than the 4.2% sulfur content by weight required by Kern County Rule 407 and District Rule 4801. Therefore, compliance with PUC-quality natural gas fuel requirements will be considered compliance with Kern County Rule 407 and District Rule 4801.

- a. 199 bhp Natural Gas-Fired IC Engine (S-1525-4-4)
 - Condition 5 complies with the requirements of this rule.

9. 40 CFR Part 60, Subpart K, Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification commenced after June 11, 1973, and Prior to May 19, 1978

The tank (S-1525-1) was constructed in 1960 and has not undergone reconstruction or modification pursuant to the definitions in 40 CFR Part 60.2. Therefore, this subpart is not applicable.

10. 40 CFR Part 60, Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification commenced after May 18, 1978, and Prior to July 23, 1984

The tank (S-1525-1) was constructed in 1960 and has not undergone reconstruction or modification pursuant to the definitions in 40 CFR Part 60.2. Therefore, this subpart is not applicable.

11. 40 CFR Part 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification commenced after July 23, 1984

The tank (S-1525-1) was constructed in 1960 and has not undergone reconstruction or modification pursuant to the definitions in 40 CFR Part 60.2. Therefore, this subpart is not applicable.

12. 40 CFR Part 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

The provisions of this subpart are applicable to owners and operators of stationary spark ignition (SI) internal combustion engines (ICE) that commence construction, reconstruction, or modification after June 12, 2006.

The natural gas-fired IC engine (S-1525-4) was constructed in 1998 and has not undergone reconstruction or modification pursuant to the definitions in 40 CFR Part 60.2. Therefore, this subpart is not applicable.

13. 40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

This subpart establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary

reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations.

This facility is an area source of HAP emissions. Pursuant to Section 63.6590(a)(1)(iii), a stationary RICE at an area source of HAP emissions is existing if construction or reconstruction was commenced before June 12, 2006. The natural gas-fired IC engine (S-1525-4) was constructed in 1998 and has not undergone construction or modification; therefore, this engine is an existing RICE.

Section 63.6595(a)(1) requires affected sources that have an existing stationary SI RICE located at an area source of HAP emissions to comply with the applicable emission limitations and operating limitations no later than October 19, 2013.

Section 63.6603(a) requires owners or operators of existing stationary RICE located at an area source of HAP emissions to comply with the applicable requirements of Table 2d and the applicable operating limitations in Tables 1b and 2b. The natural gas-fired IC engine (S-1525-4) is a non-emergency, non-black start, four-stroke rich-burn (4SRB) stationary RICE less than or equal to 500 HP and located at an area source of HAP emissions. Therefore, the only applicable emission and operating limitations are specified in Table 2d.9.

Section 63.6625(e) requires owners or operators of existing non-emergency, non-black start, 4SRB stationary RICE with a site rating less than or equal to 500 HP located at an area source of HAP emissions to operate and maintain the stationary RICE according to the manufacturer's instructions or the facility's maintenance plan.

Section 63.6625(h) requires owners or operators of existing stationary engines to minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

Section 63.6625(j) allows owners or operators of existing non-emergency, non-black start, 4SRB stationary RICE less than or equal to 500 HP located at an area source of HAP emissions the option of utilizing an oil analysis program.

Section 63.6640(a) requires owners or operators to demonstrate continuous compliance with the emission and operating limitations according to the methods specified in Table 6.

Section 63.6640(b) requires owners or operators to report deviations from the emission and operating limitations according to the requirements in Section 63.6650.

Section 63.6640(e) requires owners or operators to report each instance in which they did not meet the requirements of the general provisions in Table 8.

Section 63.6650(f) requires affected sources that have obtained Title V operating permits to report all deviations defined in this subpart in the semiannual monitoring report or in a Compliance report.

Section 63.6655(a) requires owners or operators to keep the following records: copies of each notification and report submitted to comply with this subpart; the occurrence and duration of each malfunction; all required maintenance performed; and actions taken during periods of malfunction to minimize emissions.

Section 63.6655(d) requires owners or operators to keep records required in Table 6 to show continuous compliance.

Section 63.6655(e) requires owners or operators to keep records of the maintenance conducted on the stationary RICE.

Section 63.660 requires owners or operators to make records readily available for review for a period of at least five years.

- a. 199 bhp Natural Gas-Fired IC Engine (S-1525-4-4)
 - Conditions 24 through 32 comply with the requirements of this subpart.

14.40 CFR Part 64, Compliance Assurance Monitoring

This part requires Compliance Assurance Monitoring (CAM) for units that meet the following three criteria:

1. The unit has an emission limitation or standard for the pollutant.
 2. The unit has add-on controls for the pollutant (e.g. flue gas recirculation, baghouses, catalytic oxidizers).
 3. The unit has a pre-control potential to emit greater than the major source threshold for the pollutant.
- a. 55,000 bbl Fixed Roof Petroleum Storage Tank (S-1525-1-6)

The fixed-roof storage tank is equipped with pressure vacuum vents and a high level alarm system, which are not considered control devices pursuant to Section 64.1. Therefore, this permit unit is not subject to CAM.

b. 199 bhp Natural Gas-Fired IC Engine (S-1525-4-4)

The natural gas-fired IC engine has emission limits for NO_x, CO, and VOC. Additionally, the unit is equipped with non-selective catalytic reduction (NSCR), an add-on control device for NO_x, CO, and VOC. The following calculations show that the pre-control emissions are less than the major source thresholds for NO_x, CO, and VOC.

The facility has performed a source test of the exhaust stack prior to entrance to the control device to establish CAM applicability. From the source test results (see Attachment E), the uncontrolled emission factors are 0.929 lb-NO_x/MMBtu, 0.744 lb-CO/MMBtu, and 0.085 lb-VOC/MMBtu.

Assuming a bhp to Btu/hr conversion of 2,542.5 Btu/bhp-hr and a thermal efficiency of 35%, the pre-control emissions can be calculated as follows:

$$\begin{aligned} \text{NO}_x &= 0.929 \frac{\text{lb}}{\text{MMBtu}} \times \frac{1 \text{ MMBtu}}{10^6 \text{ Btu}} \times \frac{2,542.5 \text{ Btu}}{\text{bhp} \cdot \text{hr input}} \times \frac{1 \text{ bhp input}}{0.35 \text{ bhp out}} \times \frac{8,760 \text{ hr}}{\text{yr}} \times 199 \text{ bhp out} \\ &= 11,764 \text{ lb/yr} < 20,000 \text{ lb/yr (Major Source Threshold for NO}_x\text{)} \end{aligned}$$

$$\begin{aligned} \text{CO} &= 0.744 \frac{\text{lb}}{\text{MMBtu}} \times \frac{1 \text{ MMBtu}}{10^6 \text{ Btu}} \times \frac{2,542.5 \text{ Btu}}{\text{bhp} \cdot \text{hr input}} \times \frac{1 \text{ hp input}}{0.35 \text{ bhp out}} \times \frac{8,760 \text{ hr}}{\text{yr}} \times 199 \text{ bhp out} \\ &= 9,422 \text{ lb/yr} < 200,000 \text{ lb/yr (Major Source Threshold for CO)} \end{aligned}$$

$$\begin{aligned} \text{VOC} &= 0.085 \frac{\text{lb}}{\text{MMBtu}} \times \frac{1 \text{ MMBtu}}{10^6 \text{ Btu}} \times \frac{2,542.5 \text{ Btu}}{\text{bhp} \cdot \text{hr input}} \times \frac{1 \text{ bhp input}}{0.35 \text{ bhp out}} \times \frac{8,760 \text{ hr}}{\text{yr}} \times 199 \text{ bhp out} \\ &= 1,076 \text{ lb/yr} < 20,000 \text{ lb/yr (Major Source Threshold for VOC)} \end{aligned}$$

As seen above, the uncontrolled emissions for NO_x, CO, and VOC are less than the Major Source thresholds. Therefore, this permit unit is not subject to CAM requirements.

X. PERMIT SHIELD

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

A. Requirements Addressed by Model General Permit Templates

By using the model general permit template listed in Section IV of this evaluation, the applicant has requested that a permit shield be issued for requirements addressed in the template. The basis for each permit shield is discussed in the Permit Shield section of each template.

B. Requirements not Addressed by Model General Permit Templates

The applicant is requesting a permit shield for each of the requirements listed below:

1. Kern County Rule 407 and District Rule 4801

Compliance with these requirements was addressed in Section IX.B.8 of this document and is assured by condition 5 of the requirements for permit unit S-1525-4-4. Therefore, a permit shield is being granted in the requirements for permit unit S-1525-4-4, condition 23.

XI. PERMIT CONDITIONS

See draft initial Title V permit in Attachment A.

Attachment A

Draft Initial Title V Permits

San Joaquin Valley Air Pollution Control District

FACILITY: S-1525-0-2

EXPIRATION DATE: 05/31/2014

FACILITY-WIDE REQUIREMENTS

1. {4362} The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. {4363} The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. {4364} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. {4365} Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. {4366} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. {4368} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: CONOCO-PHILLIPS PIPE LINE COMPANY
Location: MIDWAY PUMP STATION, 1441 WADE AVE. IAT, CA 95268
Permit No.: 1525-0-2 (NEW) (REV. 05/07)

9. {4370} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. {4371} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. {4372} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. {4373} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. {4374} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. {4375} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. {4376} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. {4377} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. {4378} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. {4379} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. {4380} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. {4381} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. {4382} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

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10. {4371} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. {4372} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. {4373} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. {4374} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. {4375} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
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16. {4377} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. {4378} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. {4379} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. {4380} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. {4381} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. {4382} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE.
These terms and conditions are part of the Facility-wide Permit to Operate.

22. {4383} No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
23. {4384} No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. {4385} All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. {4386} The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. {4387} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. {4388} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. {4389} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. {4390} Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. {4391} Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. {4392} An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. {4393} Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. {4394} Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

34. {4395} Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axes will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. {4396} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
36. {4397} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. {4398} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. {4399} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. {4400} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. {4401} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. On (MONTH DAY, YEAR), the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate

DRAFT

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1525-1-6

EXPIRATION DATE: 03/31/2014

SECTION: 14 **TOWNSHIP:** 32S **RANGE:** 23E

EQUIPMENT DESCRIPTION:

55,000 BBL FIXED ROOF PETROLEUM STORAGE TANK (#55701) WITH TWO 12" NOZZLES WITH PRESSURE VACUUM VENTS, TWO 4" NOZZLES FOR A NEW HIGH LEVEL ALARM SYSTEM AND TANK MIXER

PERMIT UNIT REQUIREMENTS

1. Crude oil throughput from this unit shall not exceed 14,000 barrels per day based on a monthly average. [District Rule 2201] Federally Enforceable Through Title V Permit
2. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
3. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 4623] Federally Enforceable Through Title V Permit
4. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
5. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
6. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
7. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit
8. Permittee shall maintain monthly records of average daily crude oil throughput and shall submit such information to the APCO 30 days prior to the expiration date indicated in the Permit to Operate. [District Rule 2201] Federally Enforceable Through Title V Permit
9. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1525-4-4

EXPIRATION DATE: 05/31/2014

SECTION: 14 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

199 BHP WAUKESHA MODEL F1197G RICH BURN NATURAL GAS-FIRED PIPELINE PUMP ENGINE WITH NSCR AND AIR TO FUEL RATIO CONTROLLER

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Maintenance (I&M) plan submitted to the District. [District Rule 4702] Federally Enforceable Through Title V Permit
3. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702] Federally Enforceable Through Title V Permit
4. Emissions from this engine shall not exceed any of the following limits: 25 ppmvd NO_x @ 15% O₂ or equivalent to 0.303 g-NO_x/hp-hr, 0.009 g-SO_x/hp-hr, 0.063 g-PM₁₀/hp-hr, 2,000 ppmvd CO @ 15% O₂ or equivalent to 14,555 g-CO/hp-hr, or 250 ppmvd VOC @ 15% O₂ or equivalent to 1,040 g-VOC/hp-hr. [District Rules 2201, 4702, and 4801] Federally Enforceable Through Title V Permit
5. This engine shall be fired on PUC quality natural gas with a sulfur content of less than or equal to 0.017% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
6. If the engine is fired on PUC-regulated natural gas, then the permittee shall maintain on file copies of all natural gas bills or fuel throughput records for a period of five years. [District Rule 2520] Federally Enforceable Through Title V Permit
7. If the engine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the engine shall be determined using ASTM method D 1072, D 3031, D 4084 or D 3246. [District Rule 2520] Federally Enforceable Through Title V Permit
8. If the engine is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2520] Federally Enforceable Through Title V Permit
9. Source testing to measure natural gas-combustion NO_x, CO, and VOC emissions from this unit shall be measured not less than once every 24 months. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
10. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

11. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
12. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
13. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
14. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 25A or 25B, or ARB Method 100. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
15. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. VOC, NO_x, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
16. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every calendar quarter (in which a source test is not performed) using a portable emission monitor that meets District specifications [In-stack O₂ monitors may be allowed if approved by the APCO.] Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
17. If either the NO_x or CO concentrations corrected to 15% O₂, as measured by the portable analyzer, exceed the allowable emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall notify the District within the following 1 hour, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
18. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
19. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 15% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

20. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type and quantity (cubic feet of gas or gallons of liquid) of fuel used, maintenance or modifications performed, monitoring data, compliance source test results and any other information necessary to demonstrate compliance. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
21. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
22. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702] Federally Enforceable Through Title V Permit
23. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of Kern County Rule 407 and District Rule 4801. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit
24. On and after October 19, 2013, the permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
25. On and after October 19, 2013, the engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
26. On and after October 19, 2013, the engine's oil and filter shall be changed every 1,440 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
27. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d of Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
28. On and after October 19, 2013, the engine's spark plugs shall be inspected every 1,440 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
29. On and after October 19, 2013, the engine's hoses and belts shall be inspected every 1,440 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
30. On and after October 19, 2013, the permittee shall maintain monthly records that include any information necessary to demonstrate compliance with 40 CFR 63 Subpart ZZZZ. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

31. On and after October 19, 2013, the permittee shall maintain monthly records of all performance tests, opacity and visible emissions observations and required maintenance performed on the air pollution control and monitoring equipment. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
32. On and after October 19, 2013, the permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with §63 6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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Attachment B

Detailed Facility Printout

Detailed Facility Report
For Facility=1525 and excluding Deleted Permits
Sorted by Facility Name and Permit Number

CONOCOPHILLIPS PIPE LINE COMPANY MIDWAY PUMP STATION 1441 WADE AVE TAFT, CA 93268	FAC # STATUS TELEPHONE:	S 1525 A 4086267262	TYPE: TOXIC ID:	Title V. 50278	EXPIRE ON: AREA: INSP. DATE:	05/31/2014 102 / 08/12
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
S-1525-1-4	2,310,000 gallon tank	3020-05 G	1	382.00	382.00	A	55,000 BBL FIXED ROOF PETROLEUM STORAGE TANK (#55701) WITH TWO 12" NOZZLES WITH PRESSURE VACUUM VENTS, TWO 4" NOZZLES FOR A NEW HIGH LEVEL ALARM SYSTEM AND TANK MIXER
S 1525 4-3	199 hp IC engine	3020-10 B	1	117.00	117.00	A	199 BHP WAUKESHA MODEL F1197G RICH BURN NATURAL GAS-FIRED PIPELINE PUMP ENGINE WITH NSCR AND AIR TO FUEL RATIO CONTROLLER

Number of Facilities Reported: 1

Attachment C

Insignificant Activities

**San Joaquin Valley
Unified Air Pollution Control District
Title V Application - INSIGNIFICANT ACTIVITIES**

COMPANY NAME: Conoco Phillips Pipeline Company

FACILITY ID: S-1525

Check the box next to the exemption category from Rule 2020 which describes any insignificant activity or equipment at your facility not requiring a permit.

Exemption Category	Rule 2020 Citation	√	Exemption Category	Rule 2020 Citation	√
Structure or incinerator assoc. with a structure designed as a dwelling for 4 families or less	4.1	<input type="checkbox"/>	Containers used to store refined lubricating oils	6.6.8	<input checked="" type="checkbox"/>
Le.ornatives, airplanes, and watercraft used to transport passengers or freight	4.4	<input type="checkbox"/>	Unvented pressure vessels used exclusively to store liquified gases or a.soc. with exempt equipment	6.6.9 or 6.13	<input checked="" type="checkbox"/>
Natural gas or LPG-fired boilers or other indirect heat transfer units of 5 MMBtu/hr or less	6.1.1	<input type="checkbox"/>	Portable tanks used exclusively to store produced fluids for ≤ six months	6.6.10	<input checked="" type="checkbox"/>
Platon type i.c. engine with maximum continuous rating of 50 braking horsepower (bhp) or less	6.1.2	<input type="checkbox"/>	Mobile transport tanks on delivery vehicles of VOCs	6.6.11	<input type="checkbox"/>
Gas turbine engines with maximum heat input rating of 3 MMBtu/hr or less	6.1.3	<input type="checkbox"/>	Loading racks used for the transfer of less than 4,000 gal/day of unleaded organic material with initial boiling point ≥ 302 F or of fuel oil with specific gravity ≥ 0.8251	6.7.1.1	<input type="checkbox"/>
Space heating equipment other than boilers	6.1.4	<input checked="" type="checkbox"/>	Loading racks used for the transfer of asphalt, crude or residual oil stored in exempt tanks, or crude oil with specific gravity ≥ 0.8762	6.7.1.2	<input type="checkbox"/>
Cooling towers with a circulation rate less than 10,000 gal/min, and that are not used for cooling of process water, or water from barometric jets or condensers (1)	6.2	<input type="checkbox"/>	Equipment used exclusively for the transfer of refined lubricating oil	6.7.2	<input type="checkbox"/>
Use of less than 2 gal/day of graphic arts materials	6.3	<input type="checkbox"/>	Equipment used to apply architectural coatings	6.8.1	<input type="checkbox"/>
Equipment at retail establishments used to prepare food for human consumption	6.4.1	<input type="checkbox"/>	Unheated, non-conveyORIZED cleaning equipment with < 10 ft ² open area; using solvents with initial boiling point ≥ 248 F; and < 25 gal/yr. evaporative losses	6.9	<input type="checkbox"/>
Ovens at bakeries with total daily production less than 1,000 pounds and exempt by sec. 6.5.1	6.4.3	<input type="checkbox"/>	Brazing, soldering, or welding equipment	6.10	<input checked="" type="checkbox"/>
Equipment used exclusively for extruding or compression molding of rubber or plastics, where no plastisizer or blowing agent is used	6.5	<input type="checkbox"/>	Equipment used to compress natural gas	6.11	<input type="checkbox"/>
Containers used to store clean produced water	6.6.1	<input type="checkbox"/>	Fugitive emissions sources assoc. with exempt equipment	6.12	<input checked="" type="checkbox"/>
Containers ≤100 bbl used to store oil with specific gravity ≥ 0.8762	6.6.2	<input type="checkbox"/>	Pits and Ponds as defined in Rule 1320	6.15	<input type="checkbox"/>
Containers ≤ 100 bbl installed prior to 6/1/89 used to store oil with specific gravity > 0.8762	6.6.3	<input type="checkbox"/>	On-site roadmix manufacturing and the application of roadmix as a road base material	6.17	<input type="checkbox"/>
Containers with a capacity ≤ 250 gallons used to store organic material where the actual storage temperature <150 F	6.6.4	<input checked="" type="checkbox"/>	Emissions less than 2 lb/day from units not included above	6.19	<input checked="" type="checkbox"/>
Containers used to store unheated organic material with an initial boiling point: ≥ 302 F	6.6.5	<input checked="" type="checkbox"/>	Venting PUC quality natural gas from for sole purpose of pipeline and compressor repair and/or maintenance	7.2	<input checked="" type="checkbox"/>
Containers used to store fuel oils or non-air-blown asphalt with specific gravity ≥ 0.9042	6.6.6	<input type="checkbox"/>	Non-structural repairs & maintenance to permitted equipment	7.3	<input checked="" type="checkbox"/>
Containers used to store petroleum distillates used as motor fuel with specific gravity ≥ 0.8251	6.6.7	<input checked="" type="checkbox"/>	Detonation of explosives ≤ 100 lb/day and 1,000 lb/year	7.4	<input type="checkbox"/>

No insignificant activities (Check this box if no equipment in the above categories exist at your facility.)

Attachment D
Current Permits

Permit to Operate

FACILITY: S-1525

EXPIRATION DATE: 05/31/2014

LEGAL OWNER OR OPERATOR:

CONOCOPHILLIPS PIPE LINE COMPANY

MAILING ADDRESS:

1441 WADE AVE
TAFT, CA 93268

FACILITY LOCATION:

MIDWAY PUMP STATION
1441 WADE AVE
TAFT, CA 93268

FACILITY DESCRIPTION:

PIPELINE FACILITY

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

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Executive Director / APCO

David Warner

Director of Permit Services

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1525-1-4

EXPIRATION DATE: 05/31/2014

SECTION: 14 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

55,000 BBL FIXED ROOF PETROLEUM STORAGE TANK (#55701) WITH TWO 12" NOZZLES WITH PRESSURE VACUUM VENTS, TWO 4" NOZZLES FOR A NEW HIGH LEVEL ALARM SYSTEM AND TANK MIXER

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Crude oil throughput from this unit shall not exceed 14,000 barrels per day based on a monthly average. [District Rules 2201 and 4623]
4. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623]
5. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 4623]
6. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623]
7. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623]
8. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623]
9. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623]
10. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623]
11. Permittee shall maintain monthly records of average daily crude oil throughput and shall submit such information to the APCO 30 days prior to the expiration date indicated in the Permit to Operate. [District Rule 4623]
12. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623]

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1525-4-3

EXPIRATION DATE: 05/31/2014

SECTION: 14 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

199 BHP WAUKESHA MODEL F1197G RICH BURN NATURAL GAS-FIRED PIPELINE PUMP ENGINE WITH NSCR AND AIR TO FUEL RATIO CONTROLLER

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Sulfur compound emissions shall not exceed 2000 ppmv as SO₂. [District Rule 4801]
5. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Maintenance (I&M) plan submitted to the District. [District Rule 4702, 6.5.5]
6. This engine shall be equipped with a nonresettable fuel meter and a nonresettable elapsed operating time meter. The fuel meter shall be calibrated periodically per the recommendations of the manufacturer. [District Rule 4702, 5.6.6]
7. Emissions from this IC engine shall not exceed any of the following limits: 25 ppmvd NO_x @ 15% O₂ or equivalent to 0.303 g-NO_x/hp-hr, 0.009 g-SO_x/hp-hr, 0.063 g-PM₁₀/hp-hr, 2,000 ppmvd CO @ 15% O₂ or equivalent to 14.555 g-CO/hp-hr, or 250 ppmvd VOC @ 15% O₂ or equivalent to 1.040 g-VOC/hp-hr. [District Rules 2201 and District Rule 4702]
8. Unit shall be fired on PUC quality natural gas with a sulfur content of less than or equal to 0.017% by weight. [District Rule 4801]
9. If the IC engine is fired on PUC-regulated natural gas, then maintain on file copies of all natural gas bills. [District Rule 2520, 9.4.2]
10. If the engine is fired on natural gas but not PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM Method D 1072, D 3031, D 4084 or D 3246. [District Rule 4801]
11. If the engine is fired on natural gas but not PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 4801]
12. Source testing to measure natural gas-combustion NO_x, CO, and VOC emissions from this unit shall be measured not less than once every 24 months. [District Rules 4701 and 4702]
13. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702, 6.3.2]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

14. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
15. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
16. Source testing shall be performed for NOx (ppmv) according to EPA Method 7E (or ARB Method 100), and stack gas oxygen by EPA Method 3 or 3A (or ARB Method 100). Source testing for CO (ppmv) shall be performed according to EPA Method 10 (or ARB Method 100). [District Rule 1081]
17. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. VOC, NOx, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702, 6.3.2]
18. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once a month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies.. [District Rules 4701 and 4702]
19. If either the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the allowable emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall notify the District within the following 1 hour, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4701 and 4702]
20. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4701 and 4702]
21. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4701 and 4702]
22. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type and quantity (cubic feet of gas or gallons of liquid) of fuel used, maintenance or modifications performed, monitoring data, compliance source test results and any other information necessary to demonstrate compliance. [District Rule 4702, 6.2.1]
23. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 4701 and 4702]
24. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.8]

These terms and conditions are part of the Facility-wide Permit to Operate.

PERMIT-EXEMPT EQUIPMENT REGISTRATION (PEER)

PEER NO: S-1525-1-0

EXPIRATION DATE: 03/24/2013

LEGAL OWNER OR OPERATOR: CONOCOPHILLIPS PIPE LINE COMPANY

MAILING ADDRESS: 1441 WADE AVE
TAFT, CA 93268

FACILITY LOCATION: MIDWAY PUMP STATION
1441 WADE AVE
TAFT, CA 93268

EQUIPMENT DESCRIPTION:

CERTIFIED 5.0 MMBTU/HR CLEAVER BROOKS MODEL BCLE(30)-700-125-15ST S/N OL106309 NATURAL GAS-FIRED BOILER WITH A CLEAVER BROOKS MODEL 100 LOW NOX BURNER AND FLUE GAS RECIRCULATION (FGR)

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. The unit shall not exceed any of the following emission limits: 30 ppmvd-NOx @ 3% O2 or 0.036 lb-NOx/MMBtu, or 400 ppmvd-CO @ 3% O2. [District Rule 4307]
5. The owner/operator shall monitor, at least once a month, the operational characteristics recommended by the manufacturer and approved by the APCO. [District Rule 4307]
6. The owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rule 4307]
7. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rule 4307]

CONDITIONS CONTINUE ON NEXT PAGE

This PEER remains valid through the expiration date listed above, subject to payment of the annual registration fees and compliance with the PEER conditions and all applicable local, state, and federal regulations. This PEER is valid only within the San Joaquin Valley Air Pollution Control District. Any equipment or operation change may require a PEER application be filed with the District.

Seyed Sadredin

Executive Director / APCO

8 1525 1-0 4/10/2012 - 6/24/2012 - 10:00 AM - 10:30 AM

David Warner

Director of Permit Services

8. In lieu of tuning the unit twice each calendar year, the owner/operator shall monitor the emissions with a portable NOx analyzer at least twice each calendar year and adjust the unit's operating parameters accordingly to assure compliance with the emission limits of this rule. [District Rule 4307]
9. Source testing to measure NOx and CO emissions from this unit shall be conducted no earlier than 90 days prior to the date of submission of certification request (or submittal of the source test plan), and no later than July 1, 2008 or 60 days after initial start-up, whichever is later [District Rule 4307]
10. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
11. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rule 4307]
12. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4307]
13. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4307]
14. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 4307]
15. The owner/operator shall maintain records to verify that the required monitoring of the operational characteristics, and tune-ups or portable NOx analyzing has been performed. [District Rule 4307]
16. Tune-up records shall include: 1) date of tune-up, 2) name of technician performing tune-up, and 3) reason that they are qualified. [District Rule 4307]
17. Portable analyzer records shall include: 1) date of emissions analyzing, 2) results of emissions analyzing, 3) name of technician performing analyzing, 4) make and model of analyzer, 5) date of last calibration of the analyzer, and 6) a description of any adjustments made to the unit's operating parameters for the purposes of assuring compliance. [District Rule 4307]
18. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 4307]

Attachment E

Source Test Results

COMPLIANCE VERIFICATION DATA SUMMARY

Client: ConocoPhillips Pipeline Company
Test Date: 23-Mar-11

Permit # S-1525-4-3
Source: Midway Station G-1

PARAMETER		ppm(v)	ppm(v) @ 15% O2	lbs/MMBtu	g/bhp-hr
NOx as NO2, dry	Run 1	772	250	0.918	3.53
	2	821	267	0.978	3.76
	3	749	243	0.891	3.42
	Mean	781	253	0.929	3.57
District Permit Limit					
Pass/Fail					
CO	Run 1	1005	328	0.727	2.80
	2	993	322	0.720	2.77
	3	1082	351	0.784	3.01
	Mean	1026	333	0.744	2.86
District Permit Limit					
Pass/Fail					
VOC (C3-C6+)	Run 1	204	66.2	0.085	0.326
	2	215	69.7	0.089	0.343
	3	196	63.5	0.081	0.313
	Mean	205	66.5	0.085	0.327
District Permit Limit					
Pass/Fail					
Fuel "F-Factor":					8.674
(DSCF/MMBTU)					
Comments: This test was performed in the exhaust stack prior to entrance to NSCR device to establish CAM applicability. $(0.327 \text{ g-VOC/hp-hr}) * 199 \text{ hp} * 8760 \text{ hr/yr} * (1\text{-lb}/453.67 \text{ g}) = 1,257 \text{ lb-VOC/yr} (<20,000 \text{ Lb-VOC/yr})$					
For Regulatory Agency Use Only:					