



JUN 1 8 2013

Mr. Lance Erciksen Chevron U.S.A. Inc. PO Box 1392 Bakersfield, CA. 93302

Re:

Final - Authority to Construct / COC (Significant Mod)

District Facility # S-2010

Project # 1124301

Dear Mr. Erciksen:

The Air Pollution Control Officer has issued Authorities to Construct (S-2010-308-1 and '316-0) with Certificates of Conformity to Chevron U.S.A. Inc. at the Lost Hills oilfield in Section 29, T26S, R21E. Chevron U.S.A. Inc. (CUSA) applied for an Authority to Construct (ATC) to allow the use of a thermal oxidizer to control well casing emissions. Enclosed are the Authorities to Construct and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue the Authority to Construct permit was published on 5/7/13. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on 5/2/13. No comments were received following the District's preliminary decision on this project.

Prior to operating with modifications authorized by the Authority to Construct, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5.

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

David Warner

Director of Permit Services

DW:DT/st

Sincerely

Enclosures

cc: Mike Tollstrup, CARB (w/enclosure) via email cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin

Executive Oirector/Air Pollution Control Officer

Northern Region

4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6470 FAX: (209) 557-6475

Central Region (Main Office)

1990 E. Gettysburg Avenue Fresno, CA 93726-0244 Tel: (559) 230-6000 FAX: (559) 230-6061 Southern Region

34946 Flyover Court Bakersfield, CA 93308-9725 Tel: 661-392-5500 FAX: 661-392-5585 Newspaper notice for publication in Bakersfield Californian and for posting on valleyair.org

NOTICE OF FINAL DECISION FOR THE ISSUANCE OF AUTHORITY TO CONSTRUCT AND THE PROPOSED SIGNIFICANT MODIFICATION OF FEDERALLY MANDATED OPERATING PERMIT

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District has made its final decision to issue Authorities to Construct to Chevron U.S.A. Inc. at the Lost Hills oilfield in Section 29, T26S, R21E, California. Chevron U.S.A. Inc. (CUSA) applied for an Authority to Construct (ATC) to allow the use of a thermal oxidizer to control well casing emissions.

No comments were received following the District's preliminary decision on this project.

The District's analysis of the legal and factual basis for this proposed action, project #1124301, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm, the SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308, and at any other District office. For additional information, please contact the District at (661) 392-5500.





AUTHORITY TO CONSTRUCT

PERMIT NO: S-2010-308-1

ISSUANCE DATE: 06/10/2013

LEGAL OWNER OR OPERATOR: CHEVRON USA INC

MAILING ADDRESS:

PO BOX 1392

BAKERSFIELD, CA 93302

LOCATION:

LIGHT OIL WESTERN STATIONARY SOURCE

CA

SECTION: 29 TOWNSHIP: 268 RANGE: 21E

EQUIPMENT DESCRIPTION:

MODIFICATION OF TEOR SYSTEM WITH UP TO 130 STEAM ENHANCED WELLS OPERATED WITH CLOSED CASING VENTS, PERMIT EXEMPT WELL TESTERS, PRESSURE VESSELS, RELIEF TANK, AND MASTER TRAP(S) VENTED TO H2S REMOVAL SYSTEM AND THE FIELD GAS GATHERING PIPELINE: AUTHORIZE THERMAL OXIDIZER S-2010-316 AS A CONTROL DEVICE

CONDITIONS

- This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
- Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
- Well vapors shall be sent to H2S removal system and field gas gathering pipeline or to thermal oxidizer listed in S-2010-316 [District Rule 2201] Federally Enforceable Through Title V Permit
- Operation of H2S scrubber is optional. [District Rule 2201] Federally Enforceable Through Title V Permit
- During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the emission control requirements of District Rule 4401, 5.0 (as amended December 14, 2006). [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
- Emissions rate of VOC associated with the fugitive emissions from TEOR system and ancillary equipment 94.6 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

AVID WARNER, Director of Permit Services

- 7. Production from TEOR operation shall be sent only to tanks equipped with 99% vapor control. [District Rules 2201 and 4401] Federally Enforceable Through Title V Permit
- 8. This permit authorizes 10 leaks exceeding an instrument reading of 10,000 ppmv. Leaks greater in number than 10 and exceeding 10,000 ppmv are a violation of this permit. [District Rules 2201 and 4401] Federally Enforceable Through Title V Permit
- 9. Except as otherwise provided in this permit, casing vent valves shall be closed and plugged. [District Rules 2201 and 4401] Federally Enforceable Through Title V Permit
- 10. Permittee shall maintain records of the date and well identification where steam injection or well stimulation occurs, current list of all thermally enhanced production wells associated with this operation, permit numbers of tanks receiving production from the TEOR operation, leak inspection results, and accurate fugitive component counts of components in gas service and resulting emissions calculated using the emission factors in the CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c, Oil and Gas Production Screening Value Ranges Emission Factors (Feb 1999). [District Rules 2201 and 4401] Federally Enforceable Through Title V Permit
- 11. Gas and liquid leaks are as defined in Section 3.20 of Rule 4401. [District Rule 4401 3.20] Federally Enforceable Through Title V Permit
- 12. An operator shall not operate a steam-enhanced crude oil production well unless the operator complies with either of the following requirements: The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401, the well vent may be temporarily opened during periods of attended service or repair of the well provided such activity is done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere, or the steam-enhanced crude oil production well vent is open and the well vent is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401, 5.5.1 and 5.5.2] Federally Enforceable Through Title V Permit
- 13. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.8 of Rule 4401 demonstrates the existence of an open-ended line or a valve located at the end of the line that is not sealed with a blind flange, plug, cap, or a second closed valve that is not closed at all times, except during attended operations as defined by Section 5.6.2.1 of Rule 4401 requiring process fluid flow through the open-ended lines, a component with a major liquid leak, or a component with a gas leak greater than 50,000 ppmv. [District Rule 4401 5.6.2] Federally Enforceable Through Title V Permit
- 14. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.8 of Rule 4401 demonstrates the existence of any combination of components with minor liquid leaks, minor gas leaks, or a gas leaks greater than 10,000 ppmv up to 50,000 ppmv that totals more than number of leaks allowed by Table 3 of Rule 4401. [District Rule 4401 5.6.2] Federally Enforceable Through Title V Permit
- 15. An operator shall not use any component with a leak as defined in Section 3.0 of Rule 4401, or that is found to be in violation of the provisions of Section 5.6.2 of Rule 4401. However, components that were found leaking may be used provided such leaking components have been identified with a tag for repair, are repaired, or awaiting re-inspection after being repaired within the applicable time frame specified in Section 5.9 of Rule 4401. [District Rule 4401 5.7.1] Federally Enforceable Through Title V Permit
- 16. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401 5.7.2] Federally Enforceable Through Title V Permit
- 17. An operator shall comply with the requirements of Section 6.7 of Rule 4401 if there is any change in the description of major components or critical components. [District Rule 4401 5.7.3] Federally Enforceable Through Title V Permit
- 18. Except for pipes and unsafe-to-monitor components, an operator shall inspect all other components pursuant to the requirements of Section 6.3.3 of Rule 4401 at least once every year. [District Rule 4401 5.8.1] Federally Enforceable Through Title V Permit

- 19. An operator shall visually inspect all pipes at least once every year. Any visual inspection of pipes that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected within 24 hours after detecting the leak. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 4 of Rule 4401. [District Rule 4401 5.8.2] Federally Enforceable Through Title V Permit
- 20. In addition to the inspections required by Section 5.8.1 of Rule 4401, an operator shall inspect for leaks all accessible operating pumps, compressors, and PRDs in service as follows: An operator shall audio-visually (by hearing and by sight) inspect for leaks all accessible operating pumps, compressors, and PRDs in service at least once each calendar week. Any audio-visual inspection of an accessible operating pump, compressor, and PRD performed by an operator that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected not later than 24 hours after conducting the audio-visual inspection. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 4 of Rule 4401. [District Rule 4401 5.8.3] Federally Enforceable Through Title V Permit
- 21. In addition to the inspections required by Sections 5.8.1, 5.8.2 and 5.8.3 of Rule 4401, operator shall perform the following: initially inspect a PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the discovery of the release, re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection, inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. Except for PRDs subject to the requirements of Section 5.8.4.1 of Rule 4401, an operator shall inspect a component that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. [District Rule 4401 5.8.4] Federally Enforceable Through Title V Permit
- 22. An operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401 5.8.5] Federally Enforceable Through Title V Permit
- 23. District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. [District Rule 4401 5.8.6] Federally Enforceable Through Title V Permit
- 24. An operator shall affix a readily visible weatherproof tag to a leaking component upon detection of the leak and shall include the following information on the tag: date and time of leak detection, date and time of leak measurement, for a gaseous leak, the leak concentration in ppmv, for a liquid leak, whether it is a major liquid leak or a minor liquid leak, whether the component is an essential component, an unsafe-to monitor component, or a critical component. [District Rule 4401 5.9.1] Federally Enforceable Through Title V Permit
- 25. An operator shall keep the tag affixed to the component until an operator has met all of the following conditions: repaired or replaced the leaking component, re-inspected the component using the test method in Section 6.3.3, and 5.9.2.3 of Rule 4401, or the component is found to be in compliance with the requirements of this rule. [District Rule 4401 5.9.2] Federally Enforceable Through Title V Permit
- 26. An operator shall minimize a component leak in order to stop or reduce leakage to the atmosphere immediately to the extent possible, but not later than one (1) hour after detection of the leak. [District Rule 4401 5.9.3] Federally Enforceable Through Title V Permit
- 27. Except for leaking critical components or leaking essential components subject to the requirements of Section 5.9.7 of Rule 4401, if an operator has minimized a leak but the leak still exceeds the applicable leak limits as defined in Section 3.0 of Rule 4401, an operator shall comply with at least one of the following requirements as soon as practicable but not later than the time period specified in Table 4 of Rule 4401: Repair or replace the leaking component; or vent the leaking component to a VOC collection and control system as defined in Section 3.0 of Rule 4401, or remove the leaking component from operation. [District Rule 4401 5.9.4] Federally Enforceable Through Title V Permit
- 28. The repair period in calendar days shall not exceed 14 days for minor gas leaks, 5 days for major gas leaks less than or equal to 50,000 ppmv, 2 days for gas leak greater than 50,000 ppmv, 3 days for minor liquid leaks, 2 days for major liquid leaks. [District Rule 4401 5.9.4] Federally Enforceable Through Title V Permit
- 29. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period specified in Table 4 of Rule 4401. [District Rule 4401 5.9.5] Federally Enforceable Through Title V Permit

- 30. The time of the initial leak detection shall be the start of the repair period specified in Table 4 of Rule 4401. [District Rule 4401 5.9.6] Federally Enforceable Through Title V Permit
- 31. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401 5.9.7] Federally Enforceable Through Title V Permit
- 32. The operator of any steam-enhanced crude oil production well shall maintain records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401 6.1.1] Federally Enforceable Through Title V Permit
- 33. An operator of any steam-enhanced crude oil production well shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401 6.1.3] Federally Enforceable Through Title V Permit
- 34. The results of source tests conducted pursuant to Section 4.6.2 of Rule 4401 shall be submitted to the APCO within 60 days after the completion of the source test. [District Rule 4401 6.1.4] Federally Enforceable Through Title V Permit
- 35. Operator of any steam-enhanced crude oil production well shall keep an inspection log maintained pursuant to Section 6.4 of Rule 4401. [District Rule 4401 6.1.5] Federally Enforceable Through Title V Permit
- 36. Records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, instrument reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration shall be maintained. [District Rule 4401 6.1.6] Federally Enforceable Through Title V Permit
- 37. An operator shall maintain copies at the facility of the training records of the training program operated pursuant to Section 6.5 of Rule 4401. [District Rule 4401 6.1.7] Federally Enforceable Through Title V Permit
- 38. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401 6.1.8] Federally Enforceable Through Title V Permit
- 39. An operator that discovers that a PRD has released shall record the date that the release was discovered, and the identity and location of the PRD that released. An operator shall submit such information recorded during the calendar year to the APCO no later than 60 days after the end of the calendar year. [District Rule 4401 6.1.11] Federally Enforceable Through Title V Permit
- 40. An operator shall source test annually all vapor collection and control systems used to control emissions from steam-enhanced crude oil production well vents to determine the control efficiency of the device(s) used for destruction or removal of VOC. Compliance testing shall be performed annually by source testers certified by ARB. Testing shall be performed during June, July, August, or September of each year if the system's control efficiency is dependent upon ambient air temperature. [District Rule 4401 6.2.1] Federally Enforceable Through Title V Permit
- 41. If approved by EPA, ARB, and the APCO, an operator need not comply with the annual testing requirement of Section 6.2.1 if all uncondensed VOC emissions collected by a vapor collection and control system are incinerated in fuel burning equipment, an internal combustion engine or in a smokeless flare. [District Rule 4401 6.2.2] Federally Enforceable Through Title V Permit
- 42. If approved by EPA, ARB, and the APCO, an operator need not comply with the annual testing requirement of Section 6.2.1 for a vapor control system which does not have a VOC destruction device. [District Rule 4401 6.2.3] Federally Enforceable Through Title V Permit
- 43. An operator seeking approval pursuant to Section 6.2.2 or Section 6.2.3 shall submit a written request and supporting information to the APCO. The District shall evaluate the request and if approved by the APCO, the District shall provide EPA and ARB with a copy of the evaluation and shall request EPA and ARB approval. The District evaluation and the APCO request shall be deemed approved unless EPA or ARB objects to such approval in writing within 45 days of the receipt of the APCO request. [District Rule 4401 6.2.4] Federally Enforceable Through Title V Permit

- 44. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4401 6.3.1] Federally Enforceable Through Title V Permit
- 45. VOC content shall be analyzed by using the latest revision of ASTM Method E168, E169, or E260 as applicable.

 Analysis of halogenated exempt compounds shall be performed by using ARB Method 432. [District Rule 4401 6.3.2]

 Federally Enforceable Through Title V Permit
- 46. Leak inspection, other than audio-visual, and measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. Where safety is a concern, such as measuring leaks from compressor seals or pump seals when the shaft is rotating, a person shall measure leaks by placing the instrument probe inlet at a distance of one (1) centimeter or less from the surface of the component interface. [District Rule 4401 6.3.3] Federally Enforceable Through Title V Permit
- 47. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401 6.3.5] Federally Enforceable Through Title V Permit
- 48. Operator shall maintain an inspection log in which an operator records, at a minimum, all of the following information for each inspection performed: The total number of components inspected, total number and percentage of leaking components found by component type, location, type, and name or description of each leaking component and description of any unit where the leaking component is found, date of leak detection and the method of leak detection. For gaseous leaks, the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak, the date of repair, replacement, or removal from operation of leaking components, identify and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier, methods used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier, the date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced, the inspector's name, business mailing address, and business telephone number, date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401 6.4] Federally Enforceable Through Title V Permit
- 49. ATC S-2010-308-0 shall be implemented prior to or concurrently with this ATC. [District Rule 2201]





AUTHORITY TO CONSTRUCT

PERMIT NO: S-2010-316-0

ISSUANCE DATE: 06/10/2013

LEGAL OWNER OR OPERATOR: CHEVRON USA INC

MAILING ADDRESS:

PO BOX 1392

BAKERSFIELD, CA 93302

LOCATION:

LIGHT OIL WESTERN STATIONARY SOURCE

EQUIPMENT DESCRIPTION:

EPCON THERMAL OXIDIZER WITH 9.0 MMBTU/HR MAXON KINEDIZER LE BURNER OR EQUIVALENT BURNER. COMBUSTION AIR FAN, PROCESS AIR FAN, SERVED BY A DUAL CAUSTIC SO2 SCRUBBER WITH WET ESP MIST **ELIMINATOR**

CONDITIONS

- This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
- Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
- The permittee shall obtain written District approval for the use of any equivalent equipment not specifically approved by this Authority to Construct. Approval of the equivalent equipment shall be made only after the District's determination that the submitted design and performance of the proposed alternate equipment is equivalent to the specifically authorized equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
- The permittee's request for approval of equivalent equipment shall include the make, model, manufacturer's maximum rating, manufacturer's guaranteed emission rates, equipment drawing(s), and operational characteristics/parameters. [District Rule 2201] Federally Enforceable Through Title V Permit
- Alternate equipment shall be of the same class and category of source as the equipment authorized by the Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an Inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of ail other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

VID WARNER, Director of Permit Services

- 6. No emission factor and no emission shall be greater for the alternate equipment than for the proposed equipment. No changes in the hours of operation, operating rate, throughput, or firing rate may be authorized for any alternate equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. 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] Federally Enforceable Through Title V Permit
- 8. Thermal oxidizer is authorized to control well vapors from S-2010-308. [District Rule 2201] Federally Enforceable Through Title V Permit
- 9. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
- 10. Thermal oxidizer shall be equipped with waste gas volume flow meter and a supplemental gas volume flow meter.

 [District Rule 2201] Federally Enforceable Through Title V Permit
- 11. VOC content of the waste gas combusted in the thermal oxidizer shall not exceed 10% by weight. [District Rules 2201 and 4401] Federally Enforceable Through Title V Permit
- 12. The total sulfur content of the natural gas shall be less than 0.00283 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. Total quantity of supplemental fuel combusted in thermal oxidizer shall not exceed 9.0 MMBtu/hr. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. Total quantity of waste gas combusted in thermal oxidizer shall not exceed 1.0 MMscf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. Only PUC-quality natural gas shall be used for supplemental fuel. [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Scrubber recirculation liquid pH shall be maintained only by the addition of caustic unless prior approval for an alternative pH maintenance method is received from the District. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. Scrubber liquor pH shall be maintained between 6 and 8 in the primary scrubber and between 6 and 10 in the secondary scrubber and shall be continuously monitored and recorded during operation of this unit. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
- 18. Scrubber control efficiency shall be maintained at least 97.5% by weight sulfur compounds or greater, or SO2 concentration at the stack gas outlet shall not exceed 9 ppmvd corrected to 3% O2. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Thermal oxidizer VOC control efficiency shall be maintained at a minimum of 99.9% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. Maximum emissions from the thermal oxidizer shall not exceed any of the following limits: 2.86 lb-NOx/hr, 7.0 lb-SOx/hr, 1.50 lb-PM10/hr, 1.86 lb-CO/hr and 0.11 lb-VOC/hr. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
- 21. Maximum emissions from the thermal oxidizer shall not exceed any of the following limits: 18,818 lb-NOx/year, 50,000 lb-SOx/year, 9,882 lb-PM10/year, 12,249 lb-CO/year and 737 lb-VOC/year. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
- 22. Permittee shall demonstrate compliance with annual emission limits by calculation using the amount of fuel combusted, and either the results from the latest source test or the permitted emission factor if there is no source test data. [District Rule 2201] Federally Enforceable Through Title V Permit

- 23. The total sulfur concentration of the waste gas shall be determined and entered into the thermal oxidizer fuel throughput processor weekly. Permittee shall determine total sulfur concentration of the waste gas weekly using grab sample analysis by double GC performed in a laboratory. Permittee shall maintain a running total of sulfur emissions (as SO2) calculated at least weekly using the actual waste and fuel gas volumetric flow rates and total sulfur concentrations and the actual scrubber control efficiency as determined during the most recently completed compliance demonstration. [District Rule 2201] Federally Enforceable Through Title V Permit
- 24. Fuel H2S, total sulfur, and methane content shall be determined semi-annually using the following test methods ASTM D-1945 or ASTM D-6228. Sulfur content of the supplemental fuel shall be demonstrated by certified copies of the gas sulfur content performed using method ASTM D-1072 by or for the gas supplier. [District Rule 1081] Federally Enforceable Through Title V Permit
- 25. If fuel analysis is used to demonstrate compliance with conditions of this permit, the fuel higher heating value for each fuel shall be certified by a third party fuel supplier or determined by: ASTM D1826 or D1945 in conjunction with ASTM D3588 for gaseous fuels. [District Rule 2201] Federally Enforceable Through Title V Permit
- 26. Thermal oxidizer firebox shall be equipped with an operational temperature measurement device capable of recording temperature not less than every 15 minutes. [District Rule 2201] Federally Enforceable Through Title V Permit
- 27. Thermal oxidizer firebox temperature shall be maintained at a minimum of 1400 deg F. [District Rule 2201] Federally Enforceable Through Title V Permit
- 28. Scrubber mist eliminator shall be properly cleaned and maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
- 29. Exhaust gas stack shall be equipped with adequate provisions for facilitating the collection of gas samples consistent with EPA Test Methods. [District Rule 1081] Federally Enforceable Through Title V Permit
- 30. Compliance with scrubber SOx control efficiency requirement shall be demonstrated within 60 days of startup and at least once every twelve (12) months thereafter. After demonstrating compliance on two (2) consecutive annual source tests, the scrubber shall be tested not less than once every thirty-six (36) months. If the results of the applicable 36 month test demonstrates that the unit does not meet the applicable emission limits, the testing frequency shall revert to at least once every twelve (12) months [District Rule 2201] Federally Enforceable Through Title V Permit
- 31. Compliance with the thermal oxidizer's VOC control efficiency requirement shall be demonstrated within 60 days of startup and at least once every twelve (12) months thereafter. After demonstrating compliance on two (2) consecutive annual source tests, testing shall be performed not less than once every thirty-six (36) months. If the results of the applicable 36 month test demonstrates that the unit does not meet the applicable requirements, the testing frequency shall revert to at least once every twelve (12) months. [District Rule 2201] Federally Enforceable Through Title V Permit
- 32. Source testing to demonstrate compliance with destruction/control efficiency shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 33. Permittee shall keep accurate daily records of natural gas supplemental fuel and waste gas combusted, and such records shall be retained for a period of five years and be made readily available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit
- 34. The net heating value of the waste gas being combusted the thermal oxidizer shall be calculated annually using EPA Method 18, ASTM D1946, and ASTM D2382. [District Rule 2201] Federally Enforceable Through Title V Permit
- 35. Thermal oxidizer and caustic scrubber shall be operated according to manufacturers recommendations. [District Rule 2201] Federally Enforceable Through Title V Permit
- 36. Prior to operating equipment under this Authority to Construct, permittee shall surrender NOX emission reduction credits for the following quantity of emissions: 1st quarter 7042 lb, 2nd quarter 7042 lb, 3rd quarter 7042 lb, and fourth quarter 7042 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 4/21/11) for the ERC specified below. [District Rule 2201]

- 37. ERC Certificate Number S-3735-2 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201]
- 38. Prior to operating equipment under this Authority to Construct, permittee shall surrender SOX emission reduction credits for the following quantity of emissions: 1st quarter 314 lb, 2nd quarter 314 lb, 3rd quarter 314 lb, and fourth quarter 314 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 4/21/11) for the ERC specified below. [District Rule 2201]
- 39. ERC Certificate Number S-2080-5 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201]
- 40. Prior to operating equipment under this Authority to Construct, permittee shall surrender PM10 emission reduction credits for the following quantity of emissions: 1st quarter 9882 lb, 2nd quarter 9882 lb, 3rd quarter 9882 lb, and fourth quarter 9882 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 4/21/11) for the ERC specified below. [District Rule 2201]
- 41. ERC Certificate Numbers S-2275-4 and S-3679-4 (or a certificates split from these certificates) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201]
- 42. Prior to operating equipment under this Authority to Construct, permittee shall surrender CO emission reduction credits for the following quantity of emissions: 1st quarter 2116 lb, 2nd quarter 2116 lb, 3rd quarter 2116 lb, and fourth quarter 2116 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 4/21/11) for the ERC specified below. [District Rule 2201]
- 43. ERC Certificate Number S-2005001/601 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201]
- 44. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter 267 lb, 2nd quarter 267 lb, 3rd quarter 267 lb, and fourth quarter 267 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 4/21/11) for the ERC specified below. [District Rule 2201]
- 45. ERC Certificate Number S-3905-1 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201]