ATC/COC PROJECT CHECKLIST

PROJECT #: <u>S-1134096</u> FACILITY ID #: <u>S-1547</u>

REQST. COMPL.

 $\sqrt{\sqrt{2}}$

 $\sqrt{}$ _____ATC/COC FINAL PUBLIC NOTICE (NSR + Minor Mod)

- ✓ Newspaper Notice Emailed to Clerical (Check box and tab to génerate Notice)
- Send email to "OA-PublicNotices" containing the following: SUBJECT: facility name, facility id#, project #, type of notice (prelim/final) BODY: project description and why it is being noticed (exceed New Source Review notice thresholds)

ENCLOSED DOCUMENTS REQUIRED:

- Enter correct date, print all documents from file and obtain Director's signature.
- <u>V</u> Email *FINAL* Newspaper Notice for publication in <u>Bakersfield Californian</u> Pub Date:
- $\frac{\sqrt{2}}{\sqrt{2}}$ Mail *FINAL* Notice Letter to Applicant with the following attachments: $\frac{\sqrt{2}}{\sqrt{2}}$ Engineering evaluation and attachments.
 - <u>V</u><u>Newspaper Notice</u>
- $\sqrt{1}$ ____ Email *FINAL* public notice package to EPA
- $\sqrt{}$ ____ Email *FINAL* public notice package to CARB
- <u>√</u> __ Email *FINAL* Newspaper Notice, Aviso en Español and Public Notice package to "webmaster"
- $\underline{\checkmark}$ ____ After posted on website, send email with weblink of Newspaper notice, Aviso en Español, and full public notice package to:
 - ✓ specific [C, S, or N] region and District wide permitting notification listserves (both English and Spanish list serves)
 - ✓ facility specific distribution list, (AQE enter email address from PAS facility details notifications tab, if none enter NONE below): None
- ✓ ____ Mail the newspaper notice and aviso en español (NN/AE), or full public notice package (FPNP) to the persons on facility specific distribution list, as follows (entered by AQE, if none, enter NONE below):

NN/AE or FPNP Name/address:None

NN/AE or FPNP Name/address:None

 $\underline{\checkmark}$ ____ Send *FINAL* Public Notice Package to EDMS

_ Other special instructions:

Date completed: ____ By <u>Steve Davidson</u>

[Date	
-	Engineer Name	Steve Davidson
	Engineer's Regional	Leonard Scandura
	Manager	
	Equility Name	Acro Eporaly LLC
	Facility Name	Aera Energy, LLC
	Facility #	
	Project #	
	ATC's with COC	
2	(i.e. ATC # S-1234-3-2)	
	More than 1 ATC?	
	Modification Details	Aera Energy proposed to remove obsolete federal "PSD"
	(Complete Sentences)	conditions that stated SOx scrubber requirements.
	Spanish Modification Details	Aera Energy propuso eliminar condiciones anticuadas
	(Complete Sentences)	federales de Prevención de Deterioro Significativo (PSD
		que no son aplicables con requisitos de un depurador de
)	óxidos de azufre (SOx).
	Contact Receiving Proposed	Mr. John Ludwick
-	Date Preliminary Notice	November 11, 2013
	Sent to CARB and EPA	
	Date Prelim Notice	November 6, 2013
	Published	
	Mailing Address	PO Box 11164
	Mailing Address	
	Nowononor	Bakersfield, CA 93389
	Newspaper	Bakersfield Californian

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JAN 1 4 2014

Mr. John Ludwick Aera Energy, LLC PO Box 11164 Bakersfield, CA 93389

Re: Notice of Final Decision – ATC / Certificate of Conformity District Facility # S-1547 Project # S-1134096

Dear Mr. Ludwick:

The Air Pollution Control Officer has issued Authorities to Construct (ATC #S-1547-709-20, '-725-22, '-742-18, '-743-18, '-744-19, '-745-21, '-746-20, 8'-747-19, '-748-19, and '-749-23) with Certificates of Conformity to Aera Energy, LLC at the Belridge oilfield. Aera Energy proposed to remove obsolete federal "PSD" conditions that stated SOx scrubber requirements. 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 November 6, 2013. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on November 11, 2013. 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.

Mr. John Ludwick Page 2

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.

Sincerely David Warner **Director of Permit Services**

DW:SD/st

Enclosures

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

CC:



HEALTHY AIR LIVING

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1547-709-20

ISSUANCE DATE: 12/31/2013

LEGAL OWNER OR OPERATOR: AERA ENERGY LLC MAILING ADDRESS: PO BOX 11164 BAKERSFIELD, CA 93389-1164

LOCATION:

HEAVY OIL WESTERN STATIONARY SOURCE KERN COUNTY, CA

SECTION: NE03 TOWNSHIP: 29S RANGE: 21E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW-NOX BURNER AND FLUE GAS RECIRCULATION (3-2, DIS# 5401-72) (BELRIDGE 3-2): REMOVE OUTDATED PSD CONDITIONS

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
- 3. The permittee shall notify the District at least seven calendar days prior to the designation of this permit unit as a dormant emissions unit or an active emissions unit. [District Rule 1070]
- 4. When designated as a dormant emissions unit the fuel supply line shall be physically disconnected from the emissions unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 5. When designated as a dormant emissions unit, the permittee shall not be required to perform source testing or monitoring requirements otherwise required by this permit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU <u>MUST</u> 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

9-1617-709-20: Dec 31 2013 202PM - DAVIDBOB Joint Inspection NOT Regulated

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

Conditions for S-1547-709-20 (continued)

- 6. A source test to demonstrate compliance with the NOx and CO emission limits shall be performed within 60 days of recommencing operation of the dormant emissions unit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 7. All required source testing shall conform to the compliance testing procedures described in District Rule 1081(Last Amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
- 8. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 9. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 10. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. 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 semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 2520, 9.3.2, and 4320] Federally Enforceable Through Title V Permit
- 11. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6; or EPA Method 6B; or EPA Method 8; or ARB Methods 8 or 100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by double GC for H2S and mercaptans performed in the laboratory and EPA Method 19 to calculate emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
- 12. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, the following test methods (or other approved methods listed in this permit) shall be used; H2S: ASTM D6228 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory; total sulfur: ASTM 1072, D3246, D4084 or D6228; and methane content: ASTM D1945. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
- 13. 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 D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 2520, 9.3.2; 4305, 6.2.1; 4306, 6.2.1; and 4320, 6.2.1] Federally Enforceable Through Title V Permit
- Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), and 4301 (Amended December 17, 1992. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of 40 CFR 60, Subpart Dc (except 60.44c(g) and (h) and 60.48c). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 16. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 17. Natural gas fuel sulfur content shall not exceed 0.75 gr S/100 scf. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
- Steam generator shall be operated at no greater than 1,466.7 MMBtu hhv/day heat input. [District Rule 2201] Federally Enforceable Through Title V Permit

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Conditions for S-1547-709-20 (continued)

- 19. The total fuel burned in this unit shall be less than 50% by volume PUC quality natural gas determined on a calendar month basis. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
- 20. Permittee shall maintain daily records of quantity and higher heating value of natural gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
- Emission rates shall not exceed either of the following: PM10: 0.005 lb/MMBtu or SOx (as SO2): 0.002 lb/MMBtu. [District Rules 2201, 4201, 4301, 4320, 4406, 4801, and Kern County Rule 424] Federally Enforceable Through Title V Permit
- Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following: VOC: 0.003 lb/MMBtu, NOx (as NO2): 0.018 lb/MMBtu or 15 ppmv @ 3% O2, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O2. [District Rules 2201, 4301, 4305, 5.1, 4306, 5.1, 4405 and Kern County Rule 425] Federally Enforceable Through Title V Permit
- 23. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO2; sulfur 200 pounds of SO2 per hour, or 2000 ppmv as SO2, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO2 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406, 4801 and Kern County Rules 424 and 425] Federally Enforceable Through Title V Permit
- 24. Emission rates shall not exceed any of the following: PM10: 7.5 lb/day, SOx (as SO2): 3.0 lb/day, VOC: 4.5 lb/day, NOx (as NO2): 54.0 lb/day or 9855 lb/year, or CO: 45.0 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
- 25. Duration of startup and shutdown (as defined in Rule 4320) shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining of the unit, and shall not exceed 30 hours per occurrence. The operator shall maintain records of the duration of start-up, shutdown, and refractory curing periods. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 26. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every 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 unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 5.4.2; 4306, 5.4.2; and 4320, 5.7.1] Federally Enforceable Through Title V Permit
- 27. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, 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 (amended December 17, 1992), the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4.2; 4306, 5.4.2; and 4320, 5.7.1] Federally Enforceable Through Title V Permit
- 28. 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 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

S-1547-709-20 : Dec 31 2013 2:02PM - DAVIDSOS

Conditions for S-1547-709-20 (continued)

- 29. 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 3% 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 4305, 5.4.2; 4306, 5.4.2; and 4320, 5.7.1] Federally Enforceable Through Title V Permit
- 30. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. For the purposes of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 5.5.2, 4306, 5.5.2, and 4320, 5.8.2] Federally Enforceable Through Title V Permit
- 31. Whenever the unit is switched to operate with the flue gas recirculation (FGR) system in the closed position, compliance source testing for NOx and CO shall be conducted within 60 days of cessation of FGR operation date unless source testing with FGR system in the closed position has occurred within the previous 12 months. [District Rule 1070]
- 32. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rule 4320] Federally Enforceable Through Title V Permit
- 33. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 6.3, 4306, 6.3, and 4320, 6.3] Federally Enforceable Through Title V Permit
- 34. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1, 4306, 5.5.1, and 4320] Federally Enforceable Through Title V Permit
- 35. 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
- 36. The following test methods shall be used: NOx (ppmv) EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) EPA Method 19, CO (ppmv) EPA Method 10 or 10B or ARB Method 100, stack gas oxygen EPA Method 3 or 3A or ARB Method 100, SOx (lb/MMBtu) ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H2S and mercaptans performed in laboratory, fuel gas hhv ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, 4305, 6.2, 4306, 6.2, and 4320] Federally Enforceable Through Title V Permit
- 37. 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. [District Rules 4305, 5.5.5, 4306, 5.5.5, and 4320] Federally Enforceable Through Title V Permit
- 38. 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
- 39. All records shall be maintained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 6.1, 4306, 6.1, and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

S-1547-709-20 : Dec 31 2013 2:02PM - DAVIDSOS

San Joaquin Valley

IR POLLUTION CONTROL DISTRICT

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1547-725-22

LEGAL OWNER OR OPERATOR: AERA ENERGY LLC MAILING ADDRESS: PO BOX 11164 BAKERSFIELD, CA 93389-1164 **ISSUANCE DATE: 12/31/2013**

LOCATION:

HEAVY OIL WESTERN STATIONARY SOURCE KERN COUNTY, CA

SECTION: SW01 TOWNSHIP: 298 RANGE: 21E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR C.E. NATCO NATURAL GAS STEAM GENERATOR WITH A COEN QLN-ULN LOW-NOX BURNER AND FLUE GAS RECIRCULATION (#1-1B) (BELRIDGE): REMOVE OUTDATED PSD CONDITIONS

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
- 3. Emissions Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 4. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. 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 semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU <u>MUST</u> 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

DAVID WARNER, Director of Permit Services 8-1647-725-22: Dec 31 2013 2:02PM - DAVIDSO5 : Joint Inspection NOT Required

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

Conditions for S-1547-725-22 (continued)

- 5. 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 D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
- 6. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of 40 CFR 60, Subpart Dc (except 60.44c(g) and (h) and 60.48c). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 7. The operator shall demonstrate compliance with this unit's sulfur compound exhaust concentration limit(s) using one of the following: test the sulfur content of each fuel source, or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rules 2520, 9.4.2, 4301, 5.2.1 and 4801.3.1] Federally Enforceable Through Title V Permit
- Natural gas fuel sulfur content shall not exceed 0.75 gr S/100 scf. [District NSR Rule] Federally Enforceable Through Title V Permit
- 9. Steam generator shall be operated at no greater than 1,466.7 MMBtu hhv/day heat input. [District NSR Rule] Federally Enforceable Through Title V Permit
- 10. Permittee shall maintain records of higher heating value and daily quantity of natural gas burned in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
- 11. The total gas fired in this unit, on a monthly volume basis, shall be less than 50% PUC quality natural gas (as defined in Rule 4320), by volume. [District Rule 4320, 5.2] Federally Enforceable Through Title V Permit
- 12. The permittee shall maintain monthly records of the volume of PUC quality natural gas (as defined in Rule 4320) and the total gas fired in this unit. Permittee shall keep monthly records of the percentage by volume of PUC quality gas fired and indicate if the volume of PUC quality gas fired is less than 50%. [District Rule 4320, 5.2] Federally Enforceable Through Title V Permit
- Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following PM10: 0.005 lb/MMBtu, SOx (as SO2): 0.002 lb/MMBtu, VOC: 0.003 lb/MMBtu, NOx (as NO2): 0.011 lb/MMBtu or 9 ppmv @ 3% O2, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O2. [District NSR Rule, 2520, 4201, 4301, 4305, 4306, 4320, 4405, 4406, 4801 and Kern County Rules 424 and 425] Federally Enforceable Through Title V Permit
- 14. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO2; sulfur 200 pounds of SO2 per hour, or 2000 ppmv as SO2, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO2 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406, 4801 and Kern County Rules 424 and 425] Federally Enforceable Through Title V Permit
- 15. Emission rates shall not exceed any of the following: PM10: 7.3 lb/day, SOx (as SO2): 2.9 lb/day, VOC: 4.4 lb/day, NOx (as NO2): 52.8 lb/day or 5889 lb/year, or CO: 44.0 lb/day [District NSR Rule] Federally Enforceable Through Title V Permit
- 16. Duration of start-up and shutdown (as defined in Rule 4320) shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining of the unit, and shall not exceed 30 hours per occurrence. The operator shall maintain records of the duration of start-up, shutdown, and refractory curing periods. [District Rule 4320] Federally Enforceable Through Title V Permit
- 17. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every 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 unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

Conditions for S-1547-725-22 (continued)

- 18. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, 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 4305 and 4306] Federally Enforceable Through Title V Permit
- 19. 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 4305 and 4306] Federally Enforceable Through Title V Permit
- 20. 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 3% 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 4305 and 4306] Federally Enforceable Through Title V Permit
- 21. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate, no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0. For the purposes of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 22. For each steam generator site downstream of H2S scavenger chemical injection points, permittee shall monitor sulfur content of the gas prior to incineration in affected steam generators on a daily basis utilizing Draeger tubes calibrated for existing sulfur species or other District-approved fuel sulfur detection method(s) or device(s). If compliance with fuel sulfur content limit(s) for the affected steam generators is demonstrated for 5 consecutive days, then the monitoring frequency shall be weekly. [District NSR Rule] Federally Enforceable Through Title V Permit
- 23. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 24. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 25. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 26. 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. 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

CONDITIONS CONTINUE ON NEXT PAGE

Conditions for S-1547-725-22 (continued)

- 27. The following test methods shall be used: NOx (ppmv) EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) EPA Method 19, CO (ppmv) EPA Method 10 or 10B or ARB Method 100, stack gas oxygen EPA Method 3 or 3A or ARB Method 100, SOx (lb/MMBtu) ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H2S and mercaptans performed in laboratory, fuel gas hhv ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, and 4305, 6.2] Federally Enforceable Through Title V Permit
- 28. 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. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 29. All records shall be maintained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit

30. Formerly S-1511-50

547-725-22 : Dec 31 2013 2:02PM - DAVIDSC



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



AUTHORITY TO CONSTRUCT

PERMIT NO: S-1547-742-18

ISSUANCE DATE: 12/31/2013

LEGAL OWNER OR OPERATOR: AERA ENERGY LLC MAILING ADDRESS: PO BOX 11164 **BAKERSFIELD, CA 93389-1164**

LOCATION:

HEAVY OIL WESTERN STATIONARY SOURCE KERN COUNTY, CA

SECTION: NE03 TOWNSHIP: 29S RANGE: 21E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR GAS-FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW-NOX BURNER, A FLUE GAS RECIRCULATION SYSTEM AND NON-CONDENSIBLE PIPING FROM VAPOR CONTROL SYSTEM S-1547-359 (#3-2H) (BELRIDGE): REMOVE OUTDATED PSD CONDITIONS

CONDITIONS

- This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 1. 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 2. 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
- Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- The operator shall maintain all records of required monitoring data and support information for inspection at any time 4. for a period of five years. [District Rule 2520, 9.5.2] 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 ail laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

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AGANID WARNER, Director of Permit Services : Joint Inspection I

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

Conditions for S-1547-742-18 (continued)

- 5. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. 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 semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 6. 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 D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2; 4305, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
- 7. The operator shall demonstrate compliance with this unit's sulfur compound exhaust concentration limit(s) using one of the following: test the sulfur content of each fuel source, or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rules 2520, 9.4.2, 4301, 5.2.1 and Rule 4801, 3.1] Federally Enforceable Through Title V Permit
- Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of 40 CFR 60, Subpart Dc (except 60.44c(g) and (h) and 60.48c). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 9. Unit shall be equipped with the following: natural gas volume flowmeter and a TEOR non-condensible gas volume flowmeter. [District NSR Rule] Federally Enforceable Through Title V Permit
- Only natural gas or a combination of natural gas and scrubbed non-condensible gas from sulfur scrubbing system(s) S-1547-359 shall be used as fuel in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
- 11. Maximum TEOR gas flow rate for this unit shall not exceed 1,300 Mcf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
- 12. The total fuel burned in this unit shall be less than 50% by volume PUC quality natural gas determined on a calendar month basis. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
- 13. The PUC quality/produced natural gas line and CVR/waste gas line shall each be equipped with a volumetric fuel meter. Permittee shall maintain monthly records of the percentage by volume of PUC quality natural gas burned in the unit. [District Rule 4320] Federally Enforceable Through Title V Permit
- 14. Sulfur content of all fuel gas sources combined shall not exceed 5 gr-S/100 dscf. [District Rule 4320] Federally Enforceable Through Title V Permit
- 15. When natural gas and TEOR gas fired, except during startup, shutdown, and refractory curing, maximum PM10 emissions shall not exceed the lb/hr limit calculated as follows: PM10 = {(7.0 lb/day)+(249.2 lb/day)x(fraction of total TEOR gas incinerated in this unit during testing)}/(24 hr/day). [District Rules 2201, 2520, 4201 and 4301] Federally Enforceable Through Title V Permit
- Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following: VOC: 0.003 lb/MMBtu, NOx (as NO2): 0.011 lb/MMBtu or 9 ppmv @ 3% O2, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O2. [District Rules 2201, 2520, 4301, 4305, 4306, 4405 and Kern County Rule 425] Federally Enforceable Through Title V Permit
- 17. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO2; sulfur 200 pounds of SO2 per hour, or 2000 ppmv as SO2, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO2 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406, 4801 and Kern County Rules 424 and 425] Federally Enforceable Through Title V Permit
- Emission rates shall not exceed any of the following: PM10: 240.0 lb/day, VOC: 4.4 lb/day, NOx (as NO2): 52.8 lb/day or 5889 lb/year, or CO: 44.0 lb/day [District Rules 2201 and 4301, 5.2.1 and 5.2.3] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

S-1547-742-18 : Dec 31 2013 2:02PM - DAVIDSOS

Conditions for S-1547-742-18 (continued)

- 19. Duration of startup and shutdown (as defined in Rule 4320) shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining of the unit, and shall not exceed 30 hours per occurrence. The operator shall maintain records of the duration of start-up, shutdown, and refractory curing periods. [District Rule 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 20. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every 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 unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 21. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, 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 (amended December 17, 1992), the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4.2; 4306, 5.4.2; and 4320, 5.7.1] Federally Enforceable Through Title V Permit
- 22. 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 4305 and 4306] Federally Enforceable Through Title V Permit
- 23. 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 3% 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 4305 and 4306] Federally Enforceable Through Title V Permit
- 24. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. For the purposes of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 25. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rule 4320] Federally Enforceable Through Title V Permit
- 26. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306]

CONDITIONS CONTINUE ON NEXT PAGE

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Conditions for S-1547-742-18 (continued)

- 27. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 28. 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. 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
- 29. The following test methods shall be used: NOx (ppmv) EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) EPA Method 19, CO (ppmv) EPA Method 10 or 10B or ARB Method 100, stack gas oxygen EPA Method 3 or 3A or ARB Method 100, SOx (lb/MMBtu) ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H2S and mercaptans performed in laboratory, fuel gas hhv ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, 4305, 6.2, 4306, 6.2 and 4320] Federally Enforceable Through Title V Permit
- 30. 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. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 31. Fuel H2S, total sulfur, and methane content shall be determined semi-annually. [District Rule 4320] Federally Enforceable Through Title V Permit
- 32. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, the following test methods (or other approved methods listed in this permit) shall be used; H2S: ASTM D6228 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory; total sulfur: ASTM 1072, D3246, D4084 or D6228; and methane content: ASTM D1945. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
- 33. All records shall be maintained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit
- 34. Permittee shall maintain accurate records of heating values (in Btu/scf) and daily consumption of natural gas/TEOR waste gas, and such records shall be made readily available for District inspection upon request for a period of five years. [District NSR Rule, District Rule 1070, and Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit
- 35. There are no sulfur compounds daily emission limits (DELs) expressed on this permit for incineration of TEOR gas, sulfur compounds emissions are limited by DELs on permit S-1547-359. [District NSR Rule] Federally Enforceable Through Title V Permit

36. Formerly S-1511-81

S-1547-742-18 Dan 31 2013



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



AUTHORITY TO CONSTRUCT

PERMIT NO: S-1547-743-18

ISSUANCE DATE: 12/31/2013

LEGAL OWNER OR OPERATOR: AERA ENERGY LLC MAILING ADDRESS: PO BOX 11164 BAKERSFIELD, CA 93389-1164

LOCATION:

HEAVY OIL WESTERN STATIONARY SOURCE KERN COUNTY, CA

SECTION: NE03 TOWNSHIP: 29S RANGE: 21E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR EQUIPPED WITH A COEN QLN-ULN LOW-NOX BURNER, JOHN ZINK/TODD COOL FUEL SYSTEM, AND FLUE GAS RECIRCULATION AND NON-CONDENSIBLE PIPING FROM VAPOR CONTROL SYSTEM S-1547-359, (#3-2I) (BELRIDGE):REMOVE OUTDATED PSD CONDITIONS

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
- 3. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 4. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU <u>MUST</u> 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 Authonity 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

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VID WARNER, Director of Permit Services 8-1547-743-18: Doc 31 2013 202PM - DAVID805 : Joint Inspection NOT Required

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Conditions for S-1547-743-18 (continued)

Page 2 of 4

- 5. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. 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 semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 6. 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 D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2; 4305, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
- 7. The operator shall demonstrate compliance with this unit's sulfur compound exhaust concentration limit(s) using one of the following: test the sulfur content of each fuel source, or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rules 2520, 4301, and 4801] Federally Enforceable Through Title V Permit
- Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of 40 CFR 60, Subpart Dc (except 60.44c(g) and (h) and 60.48c). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 9. Unit shall be equipped with the following: natural gas volume flowmeter and TEOR non-condensible gas volume flowmeter. [District NSR Rule] Federally Enforceable Through Title V Permit
- Only natural gas or a combination of natural gas and scrubbed non-condensible gas from sulfur scrubbing system(s) S-1547-359 shall be used as fuel in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
- 11. Steam generator shall be operated at no greater than 1,466.7 MMBtu hhv/day heat input. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. Maximum TEOR gas flow rate for this unit shall not exceed 1,300 Mcf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
- 13. The total fuel burned in this unit shall be less than 50% by volume PUC quality natural gas determined on a calendar month basis. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
- 14. Fuel H2S, total sulfur, and methane content shall be determined semi-annually. [District Rule 4320] Federally Enforceable Through Title V Permit
- 15. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, the following test methods (or other approved methods listed in this permit) shall be used; H2S: ASTM D6228 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory; total sulfur: ASTM 1072, D3246, D4084 or D6228; and methane content: ASTM D1945. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
- 16. The PUC quality/produced natural gas line and CVR/waste gas line shall each be equipped with a volumetric fuel meter. Permittee shall maintain monthly records of the percentage by volume of PUC quality natural gas burned in the unit. [District Rule 4320] Federally Enforceable Through Title V Permit
- 17. Sulfur content of all fuel gas sources combined shall not exceed 5 gr-S/100 dscf. [District Rule 4320] Federally Enforceable Through Title V Permit
- 18. When fired exclusively on natural gas, except during startup, shutdown, and refractory curing, emissions from this unit shall not exceed either of the following limits: PM10: 0.005 lb/MMBtu or SOx (as SO2): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4406, 4801 and Kern County Rules 424] Federally Enforceable Through Title V Permit

Conditions for S-1547-743-18 (continued)

- 19. When natural gas and TEOR gas fired, except during startup, shutdown, and refractory curing, maximum PM10 emissions shall not exceed the lb/hr limit calculated as follows: PM10 = {(7.0 lb/day)+(249.2 lb/day)x(fraction of total TEOR gas incinerated in this unit during testing)}/(24 hr/day). [District Rules 2201, 2520, 4201 and 4301] Federally Enforceable Through Title V Permit
- Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following: VOC: 0.003 lb/MMBtu, NOx (as NO2): 0.011 lb/MMBtu or 9 ppmv @ 3% O2, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O2. [District Rules 2201, 2520, 4301, 4305, 4306, 4320, 4405 and Kern County Rule 425] Federally Enforceable Through Title V Permit
- 21. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO2; sulfur 200 pounds of SO2 per hour, or 2000 ppmv as SO2, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO2 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406, 4801 and Kern County Rules 424 and 425] Federally Enforceable Through Title V Permit
- 22. Emission rates shall not exceed any of the following: PM10: 240.0 lb/day, VOC: 4.4 lb/day, NOx (as NO2): 52.8 lb/day or 5889 lb/year, or CO: 44.0 lb/day [District Rules 2201 and 4301, 5.2.1 and 5.2.3] Federally Enforceable Through Title V Permit
- 23. Duration of startup and shutdown (as defined in Rule 4320) shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining of the unit, and shall not exceed 30 hours per occurrence. The operator shall maintain records of the duration of start-up, shutdown, and refractory curing periods. [District Rule 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 24. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every 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 unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 25. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, 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 (amended December 17, 1992), the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 26. 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 4305 and 4306] Federally Enforceable Through Title V Permit
- 27. 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 3% 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 4305 and 4306] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

S-1547-743-18 : Dec 31 2013 2:02PM - DAVIDSOS

Conditions for S-1547-743-18 (continued)

Page 4 of 4

- 28. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. For the purposes of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 29. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rule 4320] Federally Enforceable Through Title V Permit
- 30. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 31. 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. 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
- 32. The following test methods shall be used: NOx (ppmv) EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) EPA Method 19, CO (ppmv) EPA Method 10 or 10B or ARB Method 100, stack gas oxygen EPA Method 3 or 3A or ARB Method 100, SOx (lb/MMBtu) ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H2S and mercaptans performed in laboratory, fuel gas hhv ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, 4305, 6.2, 4306, 6.2 and 4320] Federally Enforceable Through Title V Permit
- 33. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 34. 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. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 35. All records shall be maintained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit
- 36. Permittee shall maintain accurate records of heating values (in Btu/scf) and daily consumption of natural gas/TEOR waste gas, and such records shall be made readily available for District inspection upon request for a period of five years. [District NSR Rule, District Rule 1070, and Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit
- 37. There are no sulfur compounds daily emission limits (DELs) expressed on this permit for incineration of TEOR gas, sulfur compounds emissions are limited by DELs on permit S-1547-359. [District NSR Rule] Federally Enforceable Through Title V Permit

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38. Formerly S-1511-82





AUTHORITY TO CONSTRUCT

PERMIT NO: S-1547-744-19

ISSUANCE DATE: 12/31/2013

LEGAL OWNER OR OPERATOR: AERA ENERGY LLC MAILING ADDRESS: PO BOX 11164 BAKERSFIELD, CA 93389-1164

LOCATION:

HEAVY OIL WESTERN STATIONARY SOURCE KERN COUNTY, CA

SECTION: NE03 TOWNSHIP: 298 RANGE: 21E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS- FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW-NOX BURNER, FLUE GAS RECIRCULATION AND NON-CONDENSABLE PIPING FROM VAPOR CONTROL SYSTEM S-1547-359, (#2-3G) (BELRIDGE): REMOVE OUTDATED PSD CONDITIONS

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
- 3. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 4. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU <u>MUST</u> 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

5-1547-744-19: Dec 31 2013 2:02PM - DAVIDSOS ; Joint Inspection NOT Required

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Conditions for S-1547-744-19 (continued)

- 5. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. 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 semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 6. 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 D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2; 4305, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
- 7. The operator shall demonstrate compliance with this unit's sulfur compound exhaust concentration limit(s) using one of the following: test the sulfur content of each fuel source, or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rules 2520, 9.4.2, 4301, 5.2.1 and Rule 4801, 3.1] Federally Enforceable Through Title V Permit
- Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of 40 CFR 60, Subpart Dc (except 60.44c(g) and (h) and 60.48c). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 9. Steam generator shall be operated at no greater than 1,466.7 MMBtu hhv/day heat input. [District NSR Rule] Federally Enforceable Through Title V Permit
- 10. Permittee shall maintain records of higher heating value and daily quantity of natural gas and vapor recovery gas burned in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
- 11. Unit shall be equipped with natural gas and vapor recovery gas volume flowmeters. [District NSR Rule] Federally Enforceable Through Title V Permit
- 12. Only natural gas or a combination of natural gas and scrubbed non-condensible gas from sulfur scrubbing system(s) S-1547-359 shall be used as fuel in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
- 13. Maximum vapor recovery gas flow rate for this unit shall not exceed 1,300 Mcf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
- 14. The total fuel burned in this unit shall be less than 50% by volume PUC quality natural gas determined on a calendar month basis. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
- 15. Fuel H2S, total sulfur, and methane content shall be determined semi-annually. [District Rule 4320] Federally Enforceable Through Title V Permit
- 16. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, the following test methods (or other approved methods listed in this permit) shall be used; H2S: ASTM D6228 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory; total sulfur: ASTM 1072, D3246, D4084 or D6228; and methane content: ASTM D1945. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
- 17. The PUC quality/produced natural gas line and CVR/waste gas line shall each be equipped with a volumetric fuel meter. Permittee shall maintain monthly records of the percentage by volume of PUC quality natural gas burned in the unit. [District Rule 4320] Federally Enforceable Through Title V Permit
- Sulfur content of all fuel gas sources combined shall not exceed 5 gr-S/100 dscf. [District Rule 4320] Federally Enforceable Through Title V Permit
- When fired exclusively on natural gas emission rates shall not exceed either of the following: PM10: 0.005 lb/MMBtu or SOx (as SO2): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4320, 4406, 4801, and Kern County Rules 424] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Conditions for S-1547-744-19 (continued)

- 20. When natural gas and vapor recovery gas fired, except during startup, shutdown, and refractory curing, maximum PM10 emissions shall not exceed the lb/hr limit calculated as follows: PM10 = {(7.0 lb/day)+(249.2 lb/day)x(fraction of total vapor recovery gas gas incinerated in this unit during testing)}/(24 hr/day). [District Rules 2201, 2520, 4201 and 4301] Federally Enforceable Through Title V Permit
- Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following: VOC: 0.003 lb/MMBtu, NOx (as NO2): 0.011 lb/MMBtu or 9 ppmv @ 3% O2, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O2. [District Rules 2201, 2520, 4301, 4305, 4306, 4405 and Kern County Rule 425] Federally Enforceable Through Title V Permit
- 22. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO2; sulfur 200 pounds of SO2 per hour, or 2000 ppmv as SO2, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO2 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406, 4801 and Kern County Rules 424 and 425] Federally Enforceable Through Title V Permit
- 23. Emission rates shall not exceed any of the following: PM10: 240.0 lb/day, VOC: 4.4 lb/day, NOx (as NO2): 52.8 lb/day or 5889 lb/year, or CO: 44.0 lb/day [District Rules 2201 and 4301, 5.2.1 and 5.2.3] Federally Enforceable Through Title V Permit
- 24. Duration of startup and shutdown (as defined in Rule 4320) shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining of the unit, and shall not exceed 30 hours per occurrence. The operator shall maintain records of the duration of start-up, shutdown, and refractory curing periods. [District Rule 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 25. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every 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 unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 26. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, 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 (amended December 17, 1992), the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 27. 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 4305 and 4306] Federally Enforceable Through Title V Permit
- 28. 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 3% 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 4305 and 4306] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

Conditions for S-1547-744-19 (continued)

- 29. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. For the purposes of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 30. For each steam generator site downstream of H2S scavenger chemical injection points, permittee shall monitor sulfur content of the gas prior to incineration in affected steam generators on a daily basis utilizing Draeger tubes calibrated for existing sulfur species or other District-approved fuel sulfur detection method(s) or device(s). If compliance with fuel sulfur content limit(s) for the affected steam generators is demonstrated for 5 consecutive days, then the monitoring frequency shall be weekly. [District Rule 2201] Federally Enforceable Through Title V Permit
- 31. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 32. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 33. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 34. 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. 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
- 35. The following test methods shall be used: NOx (ppmv) EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) EPA Method 19, CO (ppmv) EPA Method 10 or 10B or ARB Method 100, stack gas oxygen EPA Method 3 or 3A or ARB Method 100, SOx (lb/MMBtu) ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H2S and mercaptans performed in laboratory, fuel gas hhv ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, 4305, 6.2, 4306, 6.2 and 4320] Federally Enforceable Through Title V Permit
- 36. 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. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 37. All records shall be maintained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit
- 38. There are no sulfur compounds daily emission limits (DELs) expressed on this permit for incineration of vapor recovery gas, sulfur compounds emissions are limited by DELs on permit S-1547-359. [District NSR Rule] Federally Enforceable Through Title V Permit

39. Formerly S-1511-83

AIR POLLUTION CONTROL DISTRICT



AUTHORITY TO CONSTRUCT

PERMIT NO: S-1547-745-21

ISSUANCE DATE: 12/31/2013

LEGAL OWNER OR OPERATOR: AERA ENERGY LLC MAILING ADDRESS: PO BOX 11164 BAKERSFIELD, CA 93389-1164

LOCATION:

HEAVY OIL WESTERN STATIONARY SOURCE KERN COUNTY, CA

SECTION: SE02 TOWNSHIP: 29S RANGE: 21E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS-FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN 3.2 LOW-NOX BURNER, FLUE GAS RECIRCULATION (FGR) SYSTEM, AND NON-CONDENSIBLE PIPING FROM VAPOR CONTROL SYSTEM S-1547-359, (#2-3A) (BELRIDGE): REMOVE OUTDATED PSD CONDITIONS

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
- 2. 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
- 3. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 4. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU <u>MUST</u> 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

BAVID WARNER, Director of Permit Services 8-1547-745-21 : Dec 31 2013 202PM - DAVIDSOS : Joint Inspection NOT Required

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Conditions for S-1547-745-21 (continued)

Page 2 of 4

- 5. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. 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 semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 6. 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 D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2; 4305, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
- 7. The operator shall demonstrate compliance with this unit's sulfur compound exhaust concentration limit(s) using one of the following: test the sulfur content of each fuel source, or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rules 2520, 9.4.2, 4301, 5.2.1 and Rule 4801, 3.1] Federally Enforceable Through Title V Permit
- 8. Steam generator shall be operated at no greater than 1,466.7 MMBtu hhv/day heat input. [District NSR Rule] Federally Enforceable Through Title V Permit
- 9. Permittee shall maintain records of higher heating value and daily quantity of natural gas and vapor recovery gas burned in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
- 10. Unit shall be equipped with natural gas and vapor recovery gas volume flowmeters. [District NSR Rule] Federally Enforceable Through Title V Permit
- Only natural gas or a combination of natural gas and scrubbed non-condensible gas from sulfur scrubbing system(s) S-1547-359 shall be used as fuel in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
- 12. Maximum vapor recovery gas flow rate for this unit shall not exceed 1,300 Mcf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
- 13. Fuel H2S, total sulfur, and methane content shall be determined semi-annually. [District Rule 4320] Federally Enforceable Through Title V Permit
- 14. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, the following test methods (or other approved methods listed in this permit) shall be used; H2S: ASTM D6228 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory; total sulfur: ASTM 1072, D3246, D4084 or D6228; and methane content: ASTM D1945. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
- 15. The PUC quality/produced natural gas line and CVR/waste gas line shall each be equipped with a volumetric fuel meter. Permittee shall maintain monthly records of the percentage by volume of PUC quality natural gas burned in the unit. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
- 16. Sulfur content of all fuel gas sources combined shall not exceed 5 gr-S/100 dscf. [District Rule 4320] Federally Enforceable Through Title V Permit
- When fired exclusively on natural gas emission rates shall not exceed either of the following: PM10: 0.005 lb/MMBtu or SOx (as SO2): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4320, 4406, 4801, and Kern County Rule 424] Federally Enforceable Through Title V Permit
- 18. When natural gas and vapor recovery gas fired, except during startup, shutdown, and refractory curing, maximum PM10 emissions shall not exceed the lb/hr limit calculated as follows: PM10 = {(7.0 lb/day)+(249.2 lb/day)x(fraction of total vapor recovery gas gas incinerated in this unit during testing)}/(24 hr/day). [District Rules 2201, 2520, 4201 and 4301] Federally Enforceable Through Title V Permit
- Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following: VOC: 0.003 lb/MMBtu, NOx (as NO2): 0.014 lb/MMBtu or 12 ppmv @ 3% O2, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O2. [District Rules 2201, 2520, 4301, 4305, 4306, 4320, 4405 and Kern County Rule 425] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Conditions for S-1547-745-21 (continued)

- 20. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO2; sulfur 200 pounds of SO2 per hour, or 2000 ppmv as SO2, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO2 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406, 4801 and Kern County Rules 424 and 425] Federally Enforceable Through Title V Permit
- Emission rates shall not exceed any of the following: PM10: 240.0 lb/day, VOC: 4.4 lb/day, NOx (as NO2): 52.8 lb/day or 5889 lb/year, or CO: 44.0 lb/day [District Rules 2201 and 4301, 5.2.1 and 5.2.3] Federally Enforceable Through Title V Permit
- 22. Duration of startup and shutdown (as defined in Rule 4320) shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining of the unit, and shall not exceed 30 hours per occurrence. The operator shall maintain records of the duration of start-up, shutdown, and refractory curing periods. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 23. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every 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 unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 24. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, 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 (amended December 17, 1992), the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4.2; 4306, 5.4.2; and 4320, 5.7.1] Federally Enforceable Through Title V Permit
- 25. 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 4305 and 4306] Federally Enforceable Through Title V Permit
- 26. 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 3% 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 4305 and 4306] Federally Enforceable Through Title V Permit
- 27. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. For the purposes of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

Conditions for S-1547-745-21 (continued)

- 28. For each steam generator site downstream of H2S scavenger chemical injection points, permittee shall monitor sulfur content of the gas prior to incineration in affected steam generators on a daily basis utilizing Draeger tubes calibrated for existing sulfur species or other District-approved fuel sulfur detection method(s) or device(s). If compliance with fuel sulfur content limit(s) for the affected steam generators is demonstrated for 5 consecutive days, then the monitoring frequency shall be weekly. [District Rule 2201] Federally Enforceable Through Title V Permit
- 29. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 30. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 31. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 32. 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. 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
- 33. The following test methods shall be used: NOx (ppmv) EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) EPA Method 19, CO (ppmv) EPA Method 10 or 10B or ARB Method 100, stack gas oxygen EPA Method 3 or 3A or ARB Method 100, SOx (lb/MMBtu) ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H2S and mercaptans performed in laboratory, fuel gas hhv ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, 4305, 6.2, 4306, 6.2 and 4320] Federally Enforceable Through Title V Permit
- 34. 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. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 35. All records shall be maintained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit
- 36. There are no sulfur compounds daily emission limits (DELs) expressed on this permit for incineration of vapor recovery gas, sulfur compounds emissions are limited by DELs on permit S-1547-359. [District NSR Rule] Federally Enforceable Through Title V Permit

37. Formerly S-1511-84





AUTHORITY TO CONSTRUCT

PERMIT NO: S-1547-746-20

ISSUANCE DATE: 12/31/2013

LEGAL OWNER OR OPERATOR: AERA ENERGY LLC MAILING ADDRESS: PO BOX 11164 BAKERSFIELD, CA 93389-1164

LOCATION:

HEAVY OIL WESTERN STATIONARY SOURCE KERN COUNTY, CA

SECTION: SE02 TOWNSHIP: 29S RANGE: 21E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR GAS-FIRED STEAM GENERATOR, WITH COEN QLN-ULN BURNER ASSEMBLY, FLUE GAS RECIRCULATION, OXYGEN MONITOR/CONTROLLER, AND NON-CONDENSIBLE PIPING FROM VAPOR CONTROL SYSTEM S-1547-359, (#2-3B) (BELRIDGE): REMOVE OUTDATED PSD CONDITIONS

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
- 3. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 4. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU <u>MUST</u> 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

DAVID WARNER, Director of Permit Services

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Conditions for S-1547-746-20 (continued)

Page 2 of 4

- 5. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. 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 semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 6. 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 D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2; 4305, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
- 7. The operator shall demonstrate compliance with this unit's sulfur compound exhaust concentration limit(s) using one of the following: test the sulfur content of each fuel source, or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rules 2520, 9.4.2, 4301, 5.2.1 and Rule 4801, 3.1] Federally Enforceable Through Title V Permit
- 8. Steam generator shall be operated at no greater than 1,466.7 MMBtu hhv/day heat input. [District NSR Rule] Federally Enforceable Through Title V Permit
- 9. Permittee shall maintain records of higher heating value and daily quantity of natural gas and vapor recovery gas burned in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
- 10. Unit shall be equipped with natural gas and vapor recovery gas volume flowmeters. [District NSR Rule] Federally Enforceable Through Title V Permit
- 11. Only natural gas or a combination of natural gas and scrubbed non-condensible gas from sulfur scrubbing system(s) S-1547-359 shall be used as fuel in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
- 12. Maximum vapor recovery gas flow rate for this unit shall not exceed 1,300 Mcf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
- 13. The total fuel burned in this unit shall be less than 50% by volume PUC quality natural gas determined on a calendar month basis. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
- 14. Fuel H2S, total sulfur, and methane content shall be determined semi-annually. [District Rule 4320] Federally Enforceable Through Title V Permit
- 15. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, the following test methods (or other approved methods listed in this permit) shall be used; H2S: ASTM D6228 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory; total sulfur: ASTM 1072, D3246, D4084 or D6228; and methane content: ASTM D1945. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
- 16. The PUC quality/produced natural gas line and CVR/waste gas line shall each be equipped with a volumetric fuel meter. Permittee shall maintain monthly records of the percentage by volume of PUC quality natural gas burned in the unit. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
- 17. Sulfur content of all fuel gas sources combined shall not exceed 5 gr-S/100 dscf. [District Rule 4320] Federally Enforceable Through Title V Permit
- When fired exclusively on natural gas emission rates shall not exceed either of the following: PM10: 0.005 lb/MMBtu or SOx (as SO2): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4320, 4406, 4801, and Kern County Rule 424] Federally Enforceable Through Title V Permit
- 19. When natural gas and vapor recovery gas fired, except during startup, shutdown, and refractory curing, maximum PM10 emissions shall not exceed the lb/hr limit calculated as follows: PM10 = {(7.0 lb/day)+(249.2 lb/day)x(fraction of total vapor recovery gas gas incinerated in this unit during testing)}/(24 hr/day). [District Rules 2201, 2520, 4201 and 4301] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Conditions for S-1547-746-20 (continued)

- Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following: VOC: 0.003 lb/MMBtu, NOx (as NO2): 0.011 lb/MMBtu or 9 ppmv @ 3% O2, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O2. [District Rules 2201, 2520, 4301, 4305, 4306, 4405 and Kern County Rule 425] Federally Enforceable Through Title V Permit
- 21. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO2; sulfur 200 pounds of SO2 per hour, or 2000 ppmv as SO2, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO2 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406, 4801 and Kern County Rules 424 and 425] Federally Enforceable Through Title V Permit
- 22. Emission rates shall not exceed any of the following: PM10: 240.0 lb/day, VOC: 4.4 lb/day, NOx (as NO2): 52.8 lb/day or 5889 lb/year, or CO: 44.0 lb/day [District Rules 2201 and 4301, 5.2.1 and 5.2.3] Federally Enforceable Through Title V Permit
- 23. Duration of startup and shutdown (as defined in Rule 4320) shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining of the unit, and shall not exceed 30 hours per occurrence. The operator shall maintain records of the duration of start-up, shutdown, and refractory curing periods. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 24. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every 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 unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 25. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, 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 (amended December 17, 1992), the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4.2; 4306, 5.4.2; and 4320, 5.7.1] Federally Enforceable Through Title V Permit
- 26. 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 4305 and 4306] Federally Enforceable Through Title V Permit
- 27. 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 3% 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 4305 and 4306] Federally Enforceable Through Title V Permit
- 28. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. For the purposes of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

Conditions for S-1547-746-20 (continued)

- 29. For each steam generator site downstream of H2S scavenger chemical injection points, permittee shall monitor sulfur content of the gas prior to incineration in affected steam generators on a daily basis utilizing Draeger tubes calibrated for existing sulfur species or other District-approved fuel sulfur detection method(s) or device(s). If compliance with fuel sulfur content limit(s) for the affected steam generators is demonstrated for 5 consecutive days, then the monitoring frequency shall be weekly. [District Rule 2201] Federally Enforceable Through Title V Permit
- 30. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 31. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 32. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 33. 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. 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
- 34. The following test methods shall be used: NOx (ppmv) EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) EPA Method 19, CO (ppmv) EPA Method 10 or 10B or ARB Method 100, stack gas oxygen EPA Method 3 or 3A or ARB Method 100, SOx (lb/MMBtu) ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H2S and mercaptans performed in laboratory, fuel gas hhv ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, 4305, 6.2, 4306, 6.2 and 4320] Federally Enforceable Through Title V Permit
- 35. 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. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 36. All records shall be maintained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit
- 37. There are no sulfur compounds daily emission limits (DELs) expressed on this permit for incineration of vapor recovery gas, sulfur compounds emissions are limited by DELs on permit S-1547-359. [District NSR Rule] Federally Enforceable Through Title V Permit



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



AUTHORITY TO CONSTRUCT

PERMIT NO: S-1547-747-19

ISSUANCE DATE: 12/31/2013

LEGAL OWNER OR OPERATOR: AERA ENERGY LLC MAILING ADDRESS: PO BOX 11164 PO BOX 11164

LOCATION:

BAKERSFIELD, CA 93389-1164 HEAVY OIL WESTERN STATIONARY SOURCE KERN COUNTY, CA

SECTION: SE02 TOWNSHIP: 29S RANGE: 21E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR, WITH A COEN QLN-ULN LOW-NOX BURNER, FLUE GAS RECIRCULATION AND NON-CONDENSIBLE PIPING FROM VAPOR CONTROL SYSTEM S-1547-359, (#2-3C) (BELRIDGE): REMOVE OUTDATED PSD CONDITIONS

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
- 3. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 4. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU <u>MUST</u> 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

6441D WARNER, Director of Permit Services 8-1547-747-19: Dec 31 2013 2:02PM - DAVIDSO8 : doint inspection NOT Required

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Conditions for S-1547-747-19 (continued)

8-1547-747-19 : Dec 31 2013 2:02PM - DAVID8O8

Page 2 of 4

- 5. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. 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 semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 6. 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 D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
- 7. The operator shall demonstrate compliance with this unit's sulfur compound exhaust concentration limit(s) using one of the following: test the sulfur content of each fuel source, or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rules 2520, 9.4.2, 4301, 5.2.1, 4320] Federally Enforceable Through Title V Permit
- Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of 40 CFR 60, Subpart Dc (except 60.44c(g) and (h) and 60.48c). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 9. Steam generator shall be operated at no greater than 1,466.7 MMBtu hhv/day heat input. [District NSR Rule] Federally Enforceable Through Title V Permit
- 10. Permittee shall maintain records of higher heating value and daily quantity of natural gas and vapor recovery gas burned in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
- 11. Unit shall be equipped with natural gas and vapor recovery gas volume flowmeters. [District NSR Rule] Federally Enforceable Through Title V Permit
- 12. Only natural gas or a combination of natural gas and scrubbed non-condensible gas from sulfur scrubbing system(s) S-1547-359 shall be used as fuel in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
- 13. Maximum vapor recovery gas flow rate for this unit shall not exceed 1,300 Mcf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
- 14. The total fuel burned in this unit shall be less than 50% by volume PUC quality natural gas determined on a calendar month basis. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
- 15. Fuel H2S, total sulfur, and methane content shall be determined semi-annually. [District Rule 4320] Federally Enforceable Through Title V Permit
- 16. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, the following test methods (or other approved methods listed in this permit) shall be used; H2S: ASTM D6228 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory; total sulfur: ASTM 1072, D3246, D4084 or D6228; and methane content: ASTM D1945. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
- 17. The PUC quality/produced natural gas line and CVR/waste gas line shall each be equipped with a volumetric fuel meter. Permittee shall maintain monthly records of the percentage by volume of PUC quality natural gas burned in the unit. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
- 18. Sulfur content of all fuel gas sources combined shall not exceed 5 gr-S/100 dscf. [District Rule 4320] Federally Enforceable Through Title V Permit
- When fired exclusively on natural gas, except during startup, shutdown, and refractory curing, emission rates shall not exceed the following: PM10: 0.005 lb/MMBtu or SOx (as SO2): 0.002 lb/MMBtu. [District NSR Rule, 2520, 4201, 4301, 4406, 4801 and Kern County Rules 424] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Conditions for S-1547-747-19 (continued)

- 20. When natural gas and vapor recovery gas fired, except during startup, shutdown, and refractory curing, maximum PM10 emissions shall not exceed the lb/hr limit calculated as follows: PM10 = {(7.0 lb/day)+(249.2 lb/day)x(fraction of total vapor recovery gas gas incinerated in this unit during testing)}/(24 hr/day). [District NSR Rule, 2520, 4201 and 4301] Federally Enforceable Through Title V Permit
- Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following: VOC: 0.003 lb/MMBtu, NOx (as NO2): 0.011 lb/MMBtu or 9 ppmv @ 3% O2, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O2. [District NSR Rule, 2520, 4301, 4305, 4306, 4320, 4405 and Kern County Rule 425] Federally Enforceable Through Title V Permit
- 22. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO2; sulfur 200 pounds of SO2 per hour, or 2000 ppmv as SO2, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO2 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406, 4801 and Kern County Rules 424 and 425] Federally Enforceable Through Title V Permit
- 23. Emission rates shall not exceed any of the following: PM10: 240.0 lb/day, VOC: 4.4 lb/day, NOx (as NO2): 52.8 lb/day or 5889 lb/year, or CO: 44.0 lb/day [District NSR Rule, 4301, 5.2.1 and 5.2.3] Federally Enforceable Through Title V Permit
- 24. Duration of start-up and shutdown (as defined in Rule 4320) shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining of the unit, and shall not exceed 30 hours per occurrence. The operator shall maintain records of the duration of start-up, shutdown, and refractory curing periods. [District Rule 4320] Federally Enforceable Through Title V Permit
- 25. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every 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 unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 26. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, 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 (amended December 17, 1992), the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4.2; 4306, 5.4.2; and 4320, 5.7.1] Federally Enforceable Through Title V Permit
- 27. 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 4305 and 4306] Federally Enforceable Through Title V Permit
- 28. 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 3% 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 4305 and 4306] Federally Enforceable Through Title V Permit

Conditions for S-1547-747-19 (continued)

- 29. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate, no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0. For the purposes of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 30. For each steam generator site downstream of H2S scavenger chemical injection points, permittee shall monitor sulfur content of the gas prior to incineration in affected steam generators on a daily basis utilizing Draeger tubes calibrated for existing sulfur species or other District-approved fuel sulfur detection method(s) or device(s). If compliance with fuel sulfur content limit(s) for the affected steam generators is demonstrated for 5 consecutive days, then the monitoring frequency shall be weekly. [District NSR Rule] Federally Enforceable Through Title V Permit
- 31. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 32. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 33. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 34. 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. 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
- 35. The following test methods shall be used: NOx (ppmv) EPA Method 7E or ARB Method 100, NOx (ib/MMBtu) EPA Method 19, CO (ppmv) EPA Method 10 or 10B or ARB Method 100, stack gas oxygen EPA Method 3 or 3A or ARB Method 100, SOx (lb/MMBtu) ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H2S and mercaptans performed in laboratory, fuel gas hhv ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, 4305, and 4306] Federally Enforceable Through Title V Permit
- 36. 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. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 37. All records shall be maintained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit
- 38. There are no sulfur compounds daily emission limits (DELs) expressed on this permit for incineration of vapor recovery gas, sulfur compounds emissions are limited by DELs on permit S-1547-359. [District NSR Rule] Federally Enforceable Through Title V Permit
- 39. Formerly S-1511-86



San Joaquin Valley

VIR POLLUTION CONTROL DISTRICT



AUTHORITY TO CONSTRUCT

PERMIT NO: S-1547-748-19

ISSUANCE DATE: 12/31/2013

LEGAL OWNER OR OPERATOR: AERA ENERGY LLC MAILING ADDRESS: PO BOX 11164 BAKERSFIELD, CA 93389-1164

LOCATION:

HEAVY OIL WESTERN STATIONARY SOURCE KERN COUNTY, CA

SECTION: SE02 TOWNSHIP: 29S RANGE: 21E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN QLN-ULN ULTRA LOW-NOX BURNER, FLUE GAS RECIRCULATION, AND NON-CONDENSIBLE PIPING FROM VAPOR CONTROL SYSTEM S-1547-359 (#2-3D) (BELRIDGE): REMOVE OUTDATED PSD CONDITIONS

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
- 3. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 4. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU <u>MUST</u> 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

8-1547-748-19: Dec 31 2013 2:02PM – DAVIDSOS Joint Inspector NOT Required

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

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Conditions for S-1547-748-19 (continued)

Page 2 of 4

- 5. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. 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 semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 6. 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 D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.4.2; 4305, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
- 7. The operator shall demonstrate compliance with this unit's sulfur compound exhaust concentration limit(s) using one of the following: test the sulfur content of each fuel source, or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rules 2520, 9.4.2, 4301, 5.2.1 and 4801.3.1] Federally Enforceable Through Title V Permit
- Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of 40 CFR 60, Subpart Dc (except 60.44c(g) and (h) and 60.48c). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 9. Steam generator shall be operated at no greater than 1,466.7 MMBtu hhv/day heat input. [District NSR Rule] Federally Enforceable Through Title V Permit
- 10. Permittee shall maintain records of higher heating value and daily quantity of natural gas and vapor recovery gas burned in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
- 11. Unit shall be equipped with natural gas and vapor recovery gas volume flowmeters. [District NSR Rule] Federally Enforceable Through Title V Permit
- Only natural gas or a combination of natural gas and scrubbed non-condensible gas from sulfur scrubbing system(s) S-1547-359 shall be used as fuel in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
- 13. Maximum vapor recovery gas flow rate for this unit shall not exceed 1,300 Mcf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
- 14. The total fuel burned in this unit shall be less than 50% by volume PUC quality natural gas determined on a calendar month basis. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
- 15. Fuel H2S, total sulfur, and methane content shall be determined semi-annually. [District Rule 4320] Federally Enforceable Through Title V Permit
- 16. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, the following test methods (or other approved methods listed in this permit) shall be used; H2S: ASTM D6228 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory; total sulfur: ASTM 1072, D3246, D4084 or D6228; and methane content: ASTM D1945. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
- 17. The PUC quality/produced natural gas line and CVR/waste gas line shall each be equipped with a volumetric fuel meter. Permittee shall maintain monthly records of the percentage by volume of PUC quality natural gas burned in the unit. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
- Sulfur content of all fuel gas sources combined shall not exceed 5 gr-S/100 dscf. [District Rule 4320] Federally Enforceable Through Title V Permit
- When fired exclusively on natural gas, except during startup, shutdown, and refractory curing, emission rates shall not exceed the following: PM10: 0.005 lb/MMBtu or SOx (as SO2): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4406, 4801 and Kern County Rule 424] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Conditions for S-1547-748-19 (continued)

- 20. When natural gas and vapor recovery gas fired, except during startup, shutdown, and refractory curing, maximum PM10 emissions shall not exceed the lb/hr limit calculated as follows: PM10 = {(7.0 lb/day)+(249.2 lb/day)x(fraction of total vapor recovery gas gas incinerated in this unit during testing)}/(24 hr/day). [District Rules 2201, 2520, 4201 and 4301] Federally Enforceable Through Title V Permit
- Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following: VOC: 0.003 lb/MMBtu, NOx (as NO2): 0.011 lb/MMBtu or 9 ppmv @ 3% O2, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O2. [District Rules 2201, 2520, 4301, 4305, 4306, 4320,4405 and Kern County Rule 425] Federally Enforceable Through Title V Permit
- 22. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO2; sulfur 200 pounds of SO2 per hour, or 2000 ppmv as SO2, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO2 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406, 4801 and Kern County Rules 424 and 425] Federally Enforceable Through Title V Permit
- 23. Emission rates shall not exceed any of the following: PM10: 240.0 lb/day, VOC: 4.4 lb/day, NOx (as NO2): 52.8 lb/day or 5889 lb/year, or CO: 44.0 lb/day. [District Rules 2201 and 4301, 5.2.1 and 5.2.3] Federally Enforceable Through Title V Permit
- 24. Duration of start-up and shutdown (as defined in Rule 4320) shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining of the unit, and shall not exceed 30 hours per occurrence. The operator shall maintain records of the duration of start-up, shutdown, and refractory curing periods. [District Rule 4320] Federally Enforceable Through Title V Permit
- 25. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every 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 unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 26. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, 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 (amended December 17, 1992), the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 5.4.2; 4306, 5.4.2; and 4320, 5.7.1] Federally Enforceable Through Title V Permit
- 27. 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 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 28. 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 3% 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 4305 and 4306] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Conditions for S-1547-748-19 (continued)

- 29. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate, no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0. For the purposes of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 30. For each steam generator site downstream of H2S scavenger chemical injection points, permittee shall monitor sulfur content of the gas prior to incineration in affected steam generators on a daily basis utilizing Draeger tubes calibrated for existing sulfur species or other District-approved fuel sulfur detection method(s) or device(s). If compliance with fuel sulfur content limit(s) for the affected steam generators is demonstrated for 5 consecutive days, then the monitoring frequency shall be weekly. [District Rule 2201] Federally Enforceable Through Title V Permit
- 31. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 32. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 33. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 34. 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. 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
- 35. The following test methods shall be used: NOx (ppmv) EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) EPA Method 19, CO (ppmv) EPA Method 10 or 10B or ARB Method 100, stack gas oxygen EPA Method 3 or 3A or ARB Method 100, SOx (lb/MMBtu) ARB Method 8 or 100 or EPA Method 6, 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content ASTM D1072, D4468, D3246, D3246, D4084 or double GC for H2S and mercaptans performed in laboratory, fuel gas hhv ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rule 1081, and 4305, 6.2] Federally Enforceable Through Title V Permit
- 36. 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. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 37. All records shall be maintained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit
- 38. There are no sulfur compounds daily emission limits (DELs) expressed on this permit for incineration of vapor recovery gas, sulfur compounds emissions are limited by DELs on permit S-1547-359. [District NSR Rule] Federally Enforceable Through Title V Permit
- 39. Formerly S-1511-87



San Joaquin Valley

IR POLLUTION CONTROL DISTRICT



AUTHORITY TO CONSTRUCT

PERMIT NO: S-1547-749-23

ISSUANCE DATE: 12/31/2013

LEGAL OWNER OR OPERATOR:	AERA ENERGY LLC
MAILING ADDRESS:	PO BOX 11164
	BAKERSFIELD, CA 93389-1164

LOCATION:

HEAVY OIL WESTERN STATIONARY SOURCE KERN COUNTY, CA

SECTION: SE02 TOWNSHIP: 29S RANGE: 21E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH COEN QLN-ULN LOW NOX BURNER, FLUE GAS RECIRCULATION, NON-CONDENSIBLE PIPING FROM VAPOR CONTROL SYSTEM S-1547-359, (#2-3E) (BELRIDGE): REMOVE OUTDATED PSD CONDITIONS

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
- 3. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 4. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU <u>MUST</u> 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 Valiey Unlfied AIr Poliution 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

DAVID WARNER, Director of Permit Services

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Conditions for S-1547-749-23 (continued)

- 5. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. 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 semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 6. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, the following test methods (or other approved methods listed in this permit) shall be used; H2S: ASTM D6228 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory; total sulfur: ASTM 1072, D3246, D4084 or D6228; and methane content: ASTM D1945. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
- 7. The operator shall demonstrate compliance with this unit's sulfur compound exhaust concentration limit(s) using one of the following: test the sulfur content of each fuel source, or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rules 2520, 4301, and Rule 4801] Federally Enforceable Through Title V Permit
- Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of 40 CFR 60, Subpart Dc (except 60.44c(g) and (h) and 60.48c). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 9. Steam generator shall be operated at no greater than 1,466.7 MMBtu hhv/day heat input. [District NSR Rule] Federally Enforceable Through Title V Permit
- 10. Permittee shall maintain records of higher heating value and daily quantity of natural gas and vapor recovery gas burned in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
- 11. Unit shall be equipped with natural gas and vapor recovery gas volume flowmeters. [District NSR Rule] Federally Enforceable Through Title V Permit
- 12. Only natural gas or a combination of natural gas and scrubbed non-condensible gas from sulfur scrubbing system(s) S-1547-359 shall be used as fuel in this steam generator. [District NSR Rule] Federally Enforceable Through Title V Permit
- 13. Maximum vapor recovery gas flow rate for this unit shall not exceed 1,300 Mcf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
- 14. The total fuel burned in this unit shall be less than 50% by volume PUC quality natural gas determined on a calendar month basis. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
- 15. Sulfur content of all fuel gas sources combined shall not exceed 5 gr-S/100 dscf. [District Rule 4320] Federally Enforceable Through Title V Permit
- Fuel H2S, total sulfur, and methane content shall be determined semi-annually using the following test methods H2S: ASTM D6228; total sulfur: ASTM D1072; ASTM D3246, or ASTM D6228; and methane content: ASTM D1945.
 [District Rule 4320] Federally Enforceable Through Title V Permit
- 17. The PUC quality/produced natural gas line and CVR/waste gas line shall each be equipped with a volumetric fuel meter. Permittee shall maintain monthly records of the percentage by volume of PUC quality natural gas burned in the unit. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
- When fired exclusively on natural gas emission rates shall not exceed either of the following: PM10: 0.005 lb/MMBtu or SOx (as SO2): 0.002 lb/MMBtu. [District Rules 2201, 2520, 4201, 4301, 4320, 4406, 4801, and Kern County Rule 424] Federally Enforceable Through Title V Permit
- 19. When natural gas and vapor recovery gas fired, except during startup, shutdown, and refractory curing, maximum PM10 emissions shall not exceed the lb/hr limit calculated as follows: PM10 = {(7.0 lb/day)+(249.2 lb/day)x(fraction of total vapor recovery gas gas incinerated in this unit during testing)}/(24 hr/day). [District Rules 2201, 2520, 4201 and 4301] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Conditions for S-1547-749-23 (continued)

- Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following: VOC: 0.003 lb/MMBtu, NOx (as NO2): 0.011 lb/MMBtu or 9 ppmv @ 3% O2, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O2. [District Rules 2201, 2520, 4301, 4305, 4306, 4320, 4405 and Kern County Rule 425] Federally Enforceable Through Title V Permit
- 21. Emission rates during startup, shutdown and refractory curing shall not exceed: particulate matter 10 pounds per hour, or 0.1 grains/dscf calculated to 12% CO2; sulfur 200 pounds of SO2 per hour, or 2000 ppmv as SO2, or 0.11 pounds sulfur (as S) per MMBtu on average-wide basis for all units in Rule 4406 plan; NO2 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4101, 4102, 4301, 4405, 4406, 4801 and Kern County Rules 424 and 425] Federally Enforceable Through Title V Permit
- 22. Emission rates shall not exceed any of the following: PM10: 240.0 lb/day, VOC: 4.4 lb/day, NOx (as NO2): 52.8 lb/day or 5889 lb/year, or CO: 44.0 lb/day. [District Rules 2201 and 4301, 5.2.1 and 5.2.3] Federally Enforceable Through Title V Permit
- 23. Duration of startup and shutdown (as defined in Rule 4320) shall not exceed 2 hours each per occurrence. Refractory curing period is defined as a maintenance-based reduced-load period of time during which a unit is brought from a shutdown status to staged rates of firing for the sole purpose of curing new refractory lining of the unit, and shall not exceed 30 hours per occurrence. The operator shall maintain records of the duration of start-up, shutdown, and refractory curing periods. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 24. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every 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 unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 25. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, 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 (amended December 17, 1992), the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 26. 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 4305 and 4306] Federally Enforceable Through Title V Permit
- 27. 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 3% 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 4305 and 4306] Federally Enforceable Through Title V Permit
- 28. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. For the purposes of permittee-performed alternate monitoring, emissions measurements may be performed at any time after the unit reaches conditions representative of normal operation. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

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Conditions for S-1547-749-23 (continued)

- 29. For each steam generator site downstream of H2S scavenger chemical injection points, permittee shall monitor sulfur content of the gas prior to incineration in affected steam generators on a daily basis utilizing Draeger tubes calibrated for existing sulfur species or other District-approved fuel sulfur detection method(s) or device(s). If compliance with fuel sulfur content limit(s) for the affected steam generators is demonstrated for 5 consecutive days, then the monitoring frequency shall be weekly. [District Rule 2201] Federally Enforceable Through Title V Permit
- 30. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 31. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months (no more than 30 days before or after the required annual source test date). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months (no more than 30 days before or after the required 36-month source test date). If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 32. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 33. 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. 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
- 34. The following test methods shall be used: NOx (ppmv) EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) EPA Method 19, CO (ppmv) EPA Method 10 or 10B or ARB Method 100, stack gas oxygen EPA Method 3 or 3A or ARB Method 100, SOx (lb/MMBtu) ARB Method 100 or EPA Method 6, 6C or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content EPA Method 11 or 15, ASTM D3246 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv ASTM D1826 or D1945 in conjunction with ASTM D3588. [District Rules 1081, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 35. 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. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 36. All records shall be maintained for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit
- 37. There are no sulfur compounds daily emission limits (DELs) expressed on this permit for incineration of vapor recovery gas, sulfur compounds emissions are limited by DELs on permit S-1547-359. [District NSR Rule] Federally Enforceable Through Title V Permit

38. Formerly S-1511-88

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