



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



JUN 26 2014

Mr. John Haley
Aera Energy LLC
PO Box 11164
Bakersfield, CA 93389-1164

**Re: Proposed ATC / Certificate of Conformity (Significant Mod)
District Facility # S-1547
Project # 1140535**

Dear Mr. Haley:


Enclosed for your review is the District's analysis of an application for Authorities to Construct for the facility identified above. You requested that Certificates of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The project authorizes deletion and revision of Prevention of Significant Deterioration (PSD) conditions for twelve (12) steam generators and resulted in no change in emissions.

After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the Authorities to Construct with Certificates of Conformity. Please submit your comments within the 30-day public comment period, as specified in the enclosed public notice. Prior to operating with modifications authorized by the Authorities to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,



Arnaud Marjollet
Director of Permit Services

AM:RE/st

Enclosures

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

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

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

PSD Condition(s) to be deleted/revise	District Justification
<p>All equipment, facilities, or systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions. [PSD SJ 89-01] Y</p>	<p>This condition is overly vague. The NOx limit under the PSD permit is 35 ppm @ 3% O₂, and current permit limit is 15 ppm @ 3% O₂. Demonstration of compliance reflects efficient operation and minimization of air pollutant emissions.</p>
<p>All equipment, facilities, or systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions. [PSD SJ 89-01] Y</p>	<p>The 2 conditions were deleted.</p>
<p>The Regional Administrator shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in the conditions below. In addition, the Regional Administrator shall be notified in writing within 15 days of any such failure. [PSD SJ 89-01] Y</p>	<p>The District has been granted authority over PSD regulations and is now the appropriate contact. The District already has breakdown and deviation reporting procedures in place.</p>
<p>This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed under the conditions below, and the methods utilized to restore normal operations. [PSD SJ 89-01] Y</p>	<p>The 3 conditions were deleted.</p>
<p>All correspondence as required by this permit shall be forwarded to: a) Director, Air Management Division, Compliance Section (Attn: A-3-3), EPA Region IX, 75 Hawthorne Street, San Francisco, CA, 94105; b) Chief, Stationary Source Control Division, California Air Resource Board, P.O. Box 2815, Sacramento, CA, 95814; and c) Director, SJVUAPCD, 1990 East Gettysburg, Fresno, CA, 93726.</p>	
<p>This unit shall be equipped with oxygen controls, low NOx burner, and a flue gas recirculation system for the control of NOx emissions. [PSD SJ 89-01] Y</p>	<p>This FGR and low NOx burner information is included in the equipment description and therefore this redundant condition was deleted. Note that oxygen (air intake) control is included in the low NOx burner design.</p>
<p>Facility shall conduct annual performance tests for NOx and PM10 and furnish the EPA a written report of the results of such tests. The tests shall be conducted at the maximum operating capacity of the unit. Upon</p>	<p>The District requires NOx testing every 12 months and every 36 months if two successive annual tests show compliance. This condition was deleted.</p>

<p>written request from the operator, EPA may approve the conducting of performance tests at a lower specified operating capacity. Upon written request and adequate justification, EPA may waive annual testing requirements for this unit. [PSD SJ 89-01] Y</p>	<p>The District does not require PM10 source testing from gas-fired equipment where the proposed emissions factor is greater than the District FYI-328 value of 0.003 lb PM₁₀/MMBtu. The PM10 limits listed on the subject PTOs are 0.005 lb/MMBtu or 0.008 lb/MMBtu ('-827 through '-829).</p> <p>The District Source Testing Policy COM 2030, which states the equipment should be tested under normal operating conditions, has been followed by Aera. EPA has not objected to this protocol.</p> <p>Aera has formally applied to EPA to waive this requirement (please see Attachment II).</p> <p>The condition was deleted.</p>
<p>Performance tests for NOx and PM10 shall be conducted and the results reported in accordance with the test methods in 40 CFR 60, Part 60.8 and Appendix A. The following test methods shall be used: NOx - EPA methods 1 through 4 (lb/hr), and 7E (ppmv), PM10 - EPA Methods 1 through 5. Equivalent test methods may be used with prior written approval from the EPA. [PSD SJ 89-01] Y</p>	<p>District – approved NOx testing methods listed in a separate condition are NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19. Therefore the condition is redundant and was deleted.</p>
<p>EPA shall be notified in writing at least 30 days prior to performance tests. [PSD SJ 89-01] Y</p> <p>For performance test purposes, sampling ports, platforms, and access shall be provided by the operator at each exhaust system in accordance with 40 CFR 60.8(e). [PSD SJ 89-01] Y</p>	<p>PTO conditions require that the District 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 source test plan must include sampling and analysis methodologies. Therefore, these conditions are redundant and were deleted.</p>
<p>Operations during periods of startup, shutdown and malfunction shall not constitute representative conditions for the purpose of a performance test. [PSD SJ 89-01] Y</p>	<p>With deletion of the PSD performance testing requirement for NOx and PM10, this condition is no longer applicable and was deleted.</p>
<p>Field or casing head gas will be sweetened as required to limit the sulfur content of the fuel to 75 gr/scf. [PSD SJ 89-01] Y</p>	<p>The District no longer requires a sulfur content limit of combusted gas less than 1.0 gr S/100 scf for natural gas. Current permits reflect compliance with this limit. The condition was deleted.</p>
<p>Operator shall record hours of operation and amounts and types of fuel fired each calendar quarter. All information shall be recorded in a form suitable for inspection. [PSD SJ 89-01] Y</p>	<p>District requires that daily records be maintained of gas flow rate, which is more stringent than quarterly fuel use data. This information is used to verify compliance with the daily emissions limit (DEL). The District no longer requires hourly emissions limits. Records are to be kept and readily available for compliance inspection upon District request. The condition was deleted.</p>

<p>Emission rates shall not exceed any of the following: PM10: 0.303 lb/hr, NOx: 2.71 lb/hr or 35 ppmv dry, @ 3% O2. [PSD SJ 89-01] Y</p>	<p>The above PM10 limit is equivalent to 0.303 lb PM10/hr/62.5 MMBtu/hr = 0.0048 lb PM10/MMBtu.</p> <p>The District has established a NOx limit of 15 ppm, which is substantially lower than the 35 ppm limit set by the PSD permit. Further, the hourly limit of 0.303 lb/hr is essentially equivalent to the 0.005 lb PM10/MMBtu set by the District, especially considering the significant digit policy adopted by the District.</p> <p>As the District-established NOx standard 15 ppmv @ 3% O2 is much lower than the PSD limit of 35 ppmv @ 3%O2, and the PM10 limits are essentially equivalent, there is no need to retain these PSD limits for NOx and PM10.</p> <p>The above PSD limiting condition was deleted from all permits. For '-827 through '-829, which have an emissions limit of 0.008 lb PM10/MMBtu (higher than 0.005 lb/MMBtu), the DEL condition was revised (new underlined words) as follows:</p> <p>Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following: PM10: 0.008 lb/MMBtu or <u>0.303 lb/hr (PSD hourly limit)</u>, SOx (as SO2): 0.003 lb/MMBtu, VOC: 0.003 lb/MMBtu, NOx (as NO2): 0.018 lb/MMBtu or 15 ppmv @ 3% O2, or CO: 50 ppmv @ 3% O2. [District Rules 2201; 4305, 5.1 and 4306, 5.1, <u>PSD SJ 89-02</u>] Y</p>
<p>Visible emissions shall not exceed « Ringelmann or 10% opacity. [PSD SJ 89-01] Y</p>	<p>As the PSD permit issued by the EPA only includes the 10% opacity limit and there is no reference to Ringelmann, the condition was revised as indicated.</p>

Additional Permit Changes to PTO S-1547-806-10 requested by Aera

Aera has also requested that the following two (obsolete) conditions be deleted from PTO S-1547-806-10 as removal of vapor recovery gas firing was authorized by ATC S-1547-806-17

~~PM-10 and SO2 daily emission limits, when unit incinerates scrubbed non-condensable gas, shall be quantified on the mass balance basis on permit S-1547-822 for all steam generators authorized to incinerate scrubbed non-condensable gas. [District Rule 2201] Y~~

~~Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Y~~

Aera has noted that S-1547-806 is not limited to less than or equal to 1.8 billion Btu per calendar year heat input pursuant to a Section 5.5.1 Rule 4320, and therefore tuning twice a year is not required and therefore has requested the deletion of the following condition:

~~During the 36-month source testing interval the operator shall tune the unit at least twice per calendar year, (from four to eight months apart) by a qualified technician in accordance with the procedure described in Rule 4304, and shall monitor, on a monthly basis, the unit's operational characteristics recommended by the manufacturer. Semi-annual tuning is not required if emissions are monitored monthly with a portable analyzer. [District Rules 4305, 6.3 and 4306, 6.3].~~Y

The District has approved the above additional changes to PTO S-1547-806-10.

Disposition of Outstanding ATCs

Current PTOs are included in **Attachment I**.

Aera received their Title V Permit on January 31, 2003. District Rule 2520 Section 3.20.2 states that minor permit modifications do not relax monitoring, reporting, or record-keeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions. Deletion of the annual PM10 source testing requirement is a relaxation and therefore is a significant permit modification.

The facility has specifically requested that this project be processed with a Certificate of Conformity (COC), therefore the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. Aera must apply to administratively amend their Title V Operating Permit to include the requirements of the ATC(s) issued with this project.

II. Applicable Rules

- Rule 2201 New and Modified Stationary Source Review Rule (09/21/06) – **not applicable** - project is not NSR modification
- Rule 2410 Prevention of Significant Deterioration (6/16/11)
- Rule 2520 Federally Mandated Operating Permits (6/21/01)
- Rule 4101 Visible Emissions (2/17/05)
- Rule 4102 Nuisance (12/17/92)
- Rule 4201 Particulate Matter Concentration (12/17/92)
- Rule 4301 Fuel Burning Equipment (12/17/92)
- Rule 4305 Boilers, Steam Generators and Process Heaters – Phase II (8/21/03)
- Rule 4306 Boilers, Steam Generators and Process Heaters – Phase III (3/17/05)
- Rule 4320 Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr (10/16/08)
- Rule 4801 Sulfur Compounds (12/17/92)
- CH&SC 41700 Health Risk Assessment
- CH&SC 42301.6 School Notice
- Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
- California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. Project Location

The steam generators are located within the Aera's heavy oil production stationary source in the western Kern County fields at the Sections, Townships and Ranges listed in the following table:

The units are not located within 1000 feet of any K-12 school. Therefore, a school notice pursuant to CH&SC 41700 is not required.

Unit	Location
'-780	NW 35, T12N, R24W
'-781	NW 35, T12N, R24W
'-801	SE 14, T31S, R22E
'-805	SE 14, T31S, R22E
'-806	SE 14, T31S, R22E
'-812	SE 35, T12N, R24W
'-827	SE 14, T31S, R22E
'-828	SE 14, T31S, R22E
'-829	SE 14, T31S, R22E
'-885	SE 35, T12N, R24W
'-886	SE 35, T12N, R24W
'-1030	SE 35, T12N, R24W

IV. Process Description

Aera Energy conducts thermally enhanced oil recovery. The steam generators are used to provide steam to enhance oil recovery.

V. Equipment Listing

Pre-Project Equipment Description:

S-1547-780-19: 62.5MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819, (MOCO #704) (SOUTH MIDWAY)

S-1547-781-19: 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819, (MOCO #705) (SOUTH MIDWAY)

S-1547-801-10: 62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH COEN QLN-ULN BURNER AND FLUE GAS RECIRCULATION (SHALE #6, NORTH MIDWAY)

- S-1548-805-12: 62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH COEN QLN-ULN LOW NOX BURNER AND FLUE GAS RECIRCULATION (FINLEY #9, NORTH MIDWAY)
- S-1547-806-10: 62.5 MMBTU/HR NATURAL GAS FIRED STEAM GENERATOR WITH COEN ULN LOW NOX BURNER AND FLUE GAS RECIRCULATION (FINLEY #10, NORTH MIDWAY)
- S-1547-812-11: 62.5 MMBTU/HR NATURAL GAS (AND VAPOR RECOVERY GAS) FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN BURNER AND FLUE GAS RECIRCULATION (MOCO #807) (SOUTH MIDWAY)
- S-1547-827-10: 62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH COEN ULN LOW NOX BURNER AND FLUE GAS RECIRCULATION (FGR) SYSTEM [FINLEY #11, NORTH MIDWAY)
- S-1547-828-10: 62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH COEN ULN LOW NOX BURNER AND FLUE GAS RECIRCULATION (FINLEY #12, NORTH MIDWAY)
- S-1547-829-12: 62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER AND FLUE GAS RECIRCULATION (FGR) (FINLEY #13) (NORTH MIDWAY)
- S-1547-885-13: 62.5 MMBTU/HR NATURAL GAS (AND VAPOR RECOVERY GAS) FIRED STEAM GENERATOR WITH A COEN ULN BURNER AND FLUE GAS RECIRCULATION (MOCO #803) (SOUTH MIDWAY)
- S-1547-886-12: 62.5 MMBTU/HR NATURAL GAS (AND VAPOR RECOVERY GAS) FIRED STEAM GENERATOR WITH A COEN ULN BURNER AND FLUE GAS RECIRCULATION (MOCO #801) (SOUTH MIDWAY)
- S-1547-1030-10: 62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) (MOCO #805) (SOUTH MIDWAY)

Proposed Modifications:

S-1547-780-20, '-781-20, '-801-17, '-805-19, '-806-19, '-812-16, '-827-18, '-828-19, '-829-20, '-885-20, '-886-19, and '-1030-15:
DELETE/REVISE PSD CONDITIONS

Post-Project Equipment Description

- S-1547-780-20: 62.5MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819, (MOCO #704) (SOUTH MIDWAY)
- S-1547-781-20: 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819, (MOCO #705) (SOUTH MIDWAY)
- S-1547-801-17: 62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH COEN QLN-ULN BURNER AND FLUE GAS RECIRCULATION (SHALE #6, NORTH MIDWAY)
- S-1548-805-19: 62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH COEN QLN-ULN LOW NOX BURNER AND FLUE GAS RECIRCULATION (FINLEY #9, NORTH MIDWAY)
- S-1547-806-19: 62.5 MMBTU/HR NATURAL GAS FIRED STEAM GENERATOR WITH COEN ULN LOW NOX BURNER AND FLUE GAS RECIRCULATION (FINLEY #10, NORTH MIDWAY)
- S-1547-812-16: 62.5 MMBTU/HR NATURAL GAS (AND VAPOR RECOVERY GAS) FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN BURNER AND FLUE GAS RECIRCULATION (MOCO #807) (SOUTH MIDWAY)
- S-1547-827-18: 62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH COEN ULN LOW NOX BURNER AND FLUE GAS RECIRCULATION (FGR) SYSTEM [FINLEY #11, NORTH MIDWAY)
- S-1547-828-19: 62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH COEN ULN LOW NOX BURNER AND FLUE GAS RECIRCULATION (FINLEY #12, NORTH MIDWAY)
- S-1547-829-20: 62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER AND FLUE GAS RECIRCULATION (FGR) (FINLEY #13) (NORTH MIDWAY)

S-1547-885-20: 62.5 MMBTU/HR NATURAL GAS (AND VAPOR RECOVERY GAS) FIRED STEAM GENERATOR WITH A COEN ULN BURNER AND FLUE GAS RECIRCULATION (MOCO #803) (SOUTH MIDWAY)

S-1547-886-19: 62.5 MMBTU/HR NATURAL GAS (AND VAPOR RECOVERY GAS) FIRED STEAM GENERATOR WITH A COEN ULN BURNER AND FLUE GAS RECIRCULATION (MOCO #801) (SOUTH MIDWAY)

S-1547-1030-15: 62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) (MOCO #805) (SOUTH MIDWAY)

VI. Emission Control Technology Evaluation

No change to emissions control technology is proposed.

VII. General Calculations

The proposed changes do not constitute 'modifications' in accordance with District Rule 2201, Section 3.25. This will be discussed in detail in Section VIII, *District Rules 2201*, of this evaluation. Therefore, the requirements of Rule 2201 do not apply and detailed emissions calculations are not required or necessary. However, PE2 will be calculated for inclusion in the PAS emissions profile.

'-780, '-781,

Pollutant	Daily PE2			
	EF2 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/day)	Daily PE2 (lb/day)
NO_x	0.0180	60	24	27.0
SO_x	0.00200	60	24	2.9
PM₁₀	0.0050	60	24	7.2
CO	0.030	60	24	43.2
VOC	0.0030	60	24	4.3

Pollutant	Annual PE2			
	EF2 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/year)	Annual PE2 (lb/year)
NO_x	0.018	60	8,760	9,461
SO_x	0.00200	60	8,760	1,051
PM₁₀	0.0050	60	8,760	2,628
CO	0.030	60	8,760	15,768
VOC	0.0030	60	8,760	1,577

*1440 MMBtu/day limit

Pollutant	Daily PE2			
	EF2 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/day)	Daily PE2 (lb/day)
NO_x	0.018	62.5	24	27.0
SO_x	0.00200	62.5	24	3.0
PM₁₀	0.0050	62.5	24	7.5
CO	0.030	62.5	24	45.0
VOC	0.0030	62.5	24	4.5

Pollutant	Annual PE2		
	EF2 (lb/MMBtu)	Heat Input (MMBtu/year)	Annual PE2 (lb/year)
NO_x	0.018	525,600	9,461
SO_x	0.00200	525,600	1,051
PM₁₀	0.0050	525,600	2,628
CO	0.030	525,600	15,768
VOC	0.0030	525,600	1,577

'-805, '-806

Pollutant	Daily PE2			
	EF2 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/day)	Daily PE2 (lb/day)
NO_x	0.018	62.5	24	27.0
SO_x	0.00200	62.5	24	3.0
PM₁₀	0.0050	62.5	24	7.5
CO	0.038	62.5	24	56.3
VOC	0.0030	62.5	24	4.5

Pollutant	Annual PE2		
	EF2 (lb/MMBtu)	Heat Input (MMBtu/year)	Annual PE2 (lb/year)
NO_x	0.018	525,600	9,461
SO_x	0.00200	525,600	1,051
PM₁₀	0.0050	525,600	2,628
CO	0.038	525,600	19,710
VOC	0.0030	525,600	1,577

Pollutant	Daily PE2			
	EF2 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/day)	Daily PE2 (lb/day)
NO _x	0.0180	62.5	24	27.0
SO _x	0.00200	62.5	24	3.0
PM ₁₀	0.0050	62.5	24	7.5
CO	0.030	62.5	24	45.0
VOC	0.0030	62.5	24	4.5

Pollutant	Annual PE2			
	EF2 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/year)	Annual PE2 (lb/year)
NO _x	0.018	62.5	8,760	9,855
SO _x	0.00200	62.5	8,760	1,095
PM ₁₀	0.0050	62.5	8,760	2,738
CO	0.030	62.5	8,760	16,425
VOC	0.0030	62.5	8,760	1,643

'-827, '-828, '-829

Pollutant	Daily PE2			
	EF2 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/day)	Daily PE2 (lb/day)
NO_x	0.018	62.5	24	27.0
SO_x	0.00300	62.5	24	4.5
PM₁₀	0.0080	62.5	24	12.0
CO	0.038	62.5	24	56.3
VOC	0.0030	62.5	24	4.5

Pollutant	Annual PE2		
	EF2 (lb/MMBtu)	Heat Input (MMBtu/year)	Annual PE2 (lb/year)
NO_x	0.018	525,600	9,461
SO_x	0.00300	525,600	1,577
PM₁₀	0.0080	525,600	4,205
CO	0.038	525,600	19,710
VOC	0.0030	525,600	1,577

'-885, '-886

Pollutant	Daily PE2			
	EF2 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/day)	Daily PE2 (lb/day)
NO _x	0.0180	62.5	24	27.0
SO _x	0.00200	62.5	24	3.0
PM ₁₀	0.0050	62.5	24	7.5
CO	0.037	62.5	24	55.5
VOC	0.0030	62.5	24	4.5

Pollutant	Annual PE2			
	EF2 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/year)	Annual PE2 (lb/year)
NO _x	0.018	62.5	8,760	9,855
SO _x	0.00200	62.5	8,760	1,095
PM ₁₀	0.0050	62.5	8,760	2,738
CO	0.037	62.5	8,760	20,258
VOC	0.0030	62.5	8,760	1,643

Pollutant	Daily PE2			
	EF2 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/day)	Daily PE2 (lb/day)
NO _x	0.0180	62.5	24	27.0
SO _x	0.00200	62.5	24	3.0
PM ₁₀	0.0050	62.5	24	7.5
CO	0.030	62.5	24	45.0
VOC	0.0030	62.5	24	4.5

Pollutant	Annual PE2			
	EF2 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/year)	Annual PE2 (lb/year)
NO _x	0.018	62.5	8,760	9,855
SO _x	0.00200	62.5	8,760	1,095
PM ₁₀	0.0050	62.5	8,760	2,738
CO	0.030	62.5	8,760	16,425
VOC	0.0030	62.5	8,760	1,643

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

District Rule 2201 defines a modification as follows:

3.25 Modification:

3.25.1 An action including at least one of the following items:

3.25.1.1 Any change in hours of operation, production rate, or method of operation of an existing emissions unit that would necessitate a change in permit conditions.

No change in hours of operation, production rate, or method of operation of these existing steam generators is proposed.

3.25.1.2 Any structural change or addition to an existing emissions unit that would necessitate a change in, permit conditions. Routine replacement shall not be considered a structural change.

No structural change or addition is proposed to any existing emissions units.

3.25.1.3 An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.

No increase in emissions is proposed.

3.25.1.4 Addition of any new emissions unit that is subject to District permitting requirements.

No new emissions units are proposed with this project.

3.25.1.5 A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

Aera is not seeking to obtain an exemption from any applicable requirement.

3.25.2 A reconstructed Stationary Source shall be treated as a new Stationary Source and not as a modification.

Per Section 3.33 of Rule 2201, a reconstructed source is determined when the cost of replacing emissions units exceeds 50% of the cost of an entirely new stationary source.

No construction will result from this project.

As discussed above, this project is not subject to Rule 2201, as the proposed changes are not considered modifications pursuant to the rule.

Rule 2410 Prevention of Significant Deterioration

The project approves deletion/revision of existing PSD conditions with no changes in operation of the steam generators. Continued compliance is expected.

Rule 2520 Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. This facility is subject to this Rule, and has received their Title V Operating Permit. Section 3.29 defines a significant permit modification as a "permit amendment that does not qualify as a minor permit modification or administrative amendment."

Section 3.20.2 states that a minor permit modifications "Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions". Removal of PM10 source testing and associated record-keeping is a relaxation of recordkeeping requirements. As a result, the proposed project constitutes a Significant Modification to the Title V Permit pursuant to Section 3.29.

The Title V Compliance Certification form is included in **Attachment III**.

Rule 4101 Visible Emissions

Per Section 5.0, no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity). Visible emissions are not expected from these units and the facility-wide permit already contains a condition enforcing the requirements of this Rule. Therefore continued compliance is expected.

Rule 4102 Nuisance

Section 4.0 prohibits discharge of air contaminants that could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – Risk Management Policy for Permitting New and Modified Sources specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

As demonstrated above, there are no increases in emissions associated with this project, therefore a health risk assessment is not required.

Rule 4201 Particulate Matter Concentration

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot.

The units are operating in compliance with the rule and the project is not expected to affect compliance status. Continued compliance with this rule is expected.

Rule 4301 Fuel Burning Equipment

Rule 4301 limits air contaminant emissions from fuel burning equipment as defined in the rule. Section 3.1 defines fuel burning equipment as "any furnace, boiler, apparatus, stack, and all appurtenances thereto, used in the process of burning fuel for the primary purpose of producing heat or power by indirect heat transfer."

No emission changes are proposed or expected as a result of this project. Therefore, continued compliance with this rule is expected.

District Rule 4305 Boilers, Steam Generators and Process Heaters – Phase 2

The subject unit(s) is subject to Rule 4305, *Boilers, Steam Generators and Process Heaters – Phase 2*.

In addition, the unit(s) is also subject to District Rule 4320. Since emissions limits of Rule 4320 and all other requirements are equivalent or more stringent than District Rule 4305 requirements, compliance with District Rule 4320 requirements will satisfy requirements of District Rule 4305.

Therefore, compliance with District Rule 4305 requirements is expected and no further discussion is required.

District Rule 4306 Boilers, Steam Generators and Process Heaters – Phase 3

The unit is subject to District Rule 4306, *Boilers, Steam Generators and Process Heaters – Phase 3*.

The units are currently operating in compliance with the rule and the project is not expected to affect compliance status. Therefore, continued compliance with District Rule 4306 requirements is expected and no further discussion is required.

Rule 4320 – Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr

Section 5.1.2 Emissions Fee Units

The permit limits are not in compliance with the NO_x emissions limit specified in Section 5.2 and are therefore Section 5.1.2 Emissions Fee Units. The units satisfy the particulate matter control requirements of Section 5.4.

Continued compliance is expected.

Rule 4801 Sulfur Compounds

A person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: 0.2 % by volume calculated as SO₂, on a dry basis averaged over 15 consecutive minutes.

The units combust gas limited to a sulfur content of approximately 1 gr S/100 scf or less. The project will not affect compliance status.

Therefore, continued compliance with District Rule 4801 requirements is expected.

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

California Environmental Quality Act (CEQA)

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The District adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that all project specific emission unit(s) are exempt from Best Available Control Technology (BACT) requirements. Furthermore, the District has determined that potential emission increases would have a less than significant health impact on sensitive receptors.

Issuance of permits for emissions units not subject to BACT requirements and with health impact less than significant is a matter of ensuring conformity with applicable District rules and regulations and does not require discretionary judgment or deliberation. Thus, the District concludes that this permitting action constitutes a ministerial approval. Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
S-1547-780-20, '-781-20, '-801-17, '-805-19, '-806-19, '-812-16, '-827-18, '-828-19, '-829-20, '-885-20, '-886-19, and '-1030-15	3020-02-H	62.5 MMBtu/hr	\$1030.00

Attachments

- I: Current PTOs
- II: Aera letter to EPA
- II: Compliance Certification Form
- III: Draft ATCs

ATTACHMENT I
Current PTOs

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-780-19

EXPIRATION DATE: 05/31/2016

SECTION: NW35 TOWNSHIP: 12N RANGE: 24W

EQUIPMENT DESCRIPTION:

62.5MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819, (MOCO #704) (SOUTH MIDWAY)

PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. 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, 9.4.2 and 4320] Federally Enforceable Through Title V Permit
4. 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, 4306, 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
5. The operator shall demonstrate compliance with this unit's sulfur compound exhaust concentration limit(s) using one of the following: fire the unit only on PUC or FERC regulated natural gas, 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
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. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District Rule 2201; PSD SJ 89-01] Federally Enforceable Through Title V Permit
9. When combusting a combination of natural gas and vapor recovery gas, the fuel gas sulfur content shall not exceed 5 grains of total sulfur (as H₂S) per 100 dscf of fuel gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total TEOR gas from permit S-1547-819 incinerated in steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 4.09 MMscf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Permittee shall maintain accurate daily records of gas flowrate delivered to steam generators S-1547-766 to '-772, '-777 to '-781, and '-797. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Total PM10 emissions for steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 129.1 lb/day nor 47,122 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of 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 Rules 424] Federally Enforceable Through Title V Permit
16. 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, 2520, 4301, 4305, 4306, 4320, 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
18. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NOx (as NO2): 49.0 lb/day or 9,461 lb/year, or CO: 43.2 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
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 Rules 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, 4306, and 4320] 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, 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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, 4306, and 4320] Federally Enforceable Through Title V Permit
23. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 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, 4306, and 4320] 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. Source testing to measure natural gas-combustion NO_x 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
26. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. 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
28. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (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, SO_x (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
29. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
30. Operator shall provide an annual fuel sulfur content analysis to the District upon request. [District Rule 4320] Federally Enforceable Through Title V Permit
31. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
32. All equipment, facilities, or systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions. [PSD SJ 89-01] Federally Enforceable Through Title V Permit

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

33. The Regional Administrator shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in the conditions below. In addition, the Regional Administrator shall be notified in writing within 15 days of any such failure. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
34. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed under the conditions below, and the methods utilized to restore normal operations. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
35. Facility shall operate this unit in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, State and local air quality regulations. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
36. This unit shall be equipped with oxygen controls, low NOx burner, and a flue gas recirculation system for the control of NOx emissions. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
37. Facility shall conduct annual performance tests for NOx and PM10 and furnish the EPA a written report of the results of such tests. The tests shall be conducted at the maximum operating capacity of the unit. Upon written request from the operator, EPA may approve the conducting of performance tests at a lower specified operating capacity. Upon written request and adequate justification, EPA may waive annual testing requirements for this unit. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
38. Performance tests for NOx and PM10 shall be conducted and the results reported in accordance with the test methods in 40 CFR 60, Part 60.8 and Appendix A. The following test methods shall be used: NOx - EPA methods 1 through 4 (lb/hr), and 7E (ppmv), PM10 - EPA Methods 1 through 5. Equivalent test methods may be used with prior written approval from the EPA. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
39. EPA shall be notified in writing at least 30 days prior to performance tests. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
40. For performance test purposes, sampling ports, platforms, and access shall be provided by the operator at each exhaust system in accordance with 40 CFR 60.8(e). [PSD SJ 89-01] Federally Enforceable Through Title V Permit
41. Operations during periods of startup, shutdown and malfunction shall not constitute representative conditions for the purpose of a performance test. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
42. Field or casing head gas will be sweetened as required to limit the sulfur content of the fuel to 75 gr/scf. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
43. Operator shall record hours of operation and amounts and types of fuel fired each calendar quarter. All information shall be recorded in a form suitable for inspection. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
44. Emission rates shall not exceed any of the following: PM10: 0.303 lb/hr, NOx: 2.71 lb/hr or 35 ppmv dry, @ 3% O2. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
45. Visible emissions shall not exceed « Ringelmann or 10% opacity. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
46. Any relaxation in the District's Determination of Compliance conditions, Authority to Construct conditions, Permit to Operate conditions, or any other subsequent permit of legally binding document that could result in an increase of the potential to emit of any pollutant from this source above the PSD applicability thresholds will require a full PSD review of the source as if construction had not yet begun. [PSD SJ 89-01] Federally Enforceable Through Title V Permit

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

47. Facility shall have legal and operational responsibility and control of all air pollutant emitting activities of the MOCO TEOR project. This responsibility shall include, but not limited to: operating and maintaining the project to comply with all federal, state and local air pollution laws, regulations, permits, orders and other requirements; ensuring the emissions offsets or other reductions required for this project under permits issued by the District are obtained as required; any violation of any air pollution requirements are the legal responsibility of the facility in addition to any other legally responsible parties. Any proposed change to this condition shall require the prior written concurrence of the EPA. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
48. Facility is required to implement the conditions required by the U.S. Fish and Wildlife Service, as outlined in their Biological Opinion and Formal Consultation Response (August 30, 1990), to prevent the incidental taking (killing, harming or harassment) of endangered species that may be affected by this unit. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
49. All correspondence as required by this permit shall be forwarded to: a) Director, Air Management Division, Compliance Section (Attn: A-3-3), EPA Region IX, 75 Hawthorne Street, San Francisco, CA, 94105; b) Chief, Stationary Source Control Division, California Air Resource Board, P.O. Box 2815, Sacramento, CA, 95814; and c) Director, SJVUAPCD, 1990 East Gettysburg, Fresno, CA, 93726. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
50. Note: Formerly S-1511-137
51. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
52. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-781-19

EXPIRATION DATE: 05/31/2016

SECTION: NW35 TOWNSHIP: 12N RANGE: 24W

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819, (MOCO #705) (SOUTH MIDWAY)

PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. 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, 9.4.2 and 4320] Federally Enforceable Through Title V Permit
4. 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, 4306, 4320, and 4351, 6.2.1] Federally Enforceable Through Title V Permit
5. The operator shall demonstrate compliance with this unit's sulfur compound exhaust concentration limit(s) using one of the following: fire the unit only on PUC or FERC regulated natural gas, 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
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. Steam generator shall be equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District Rule 2201; PSD SJ 89-01] Federally Enforceable Through Title V Permit
9. When combusting a combination of natural gas and vapor recovery gas, the fuel gas sulfur content shall not exceed 5 grains of total sulfur (as H₂S) per 100 dscf of fuel gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total TEOR gas from permit S-1547-819 incinerated in steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 4.09 MMscf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Permittee shall maintain accurate daily records of gas flowrate delivered to steam generators S-1547-766 to '-772, '-777 to '-781, and '-797. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Total PM10 emissions for steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 129.1 lb/day nor 47,122 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of 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 Rules 424] Federally Enforceable Through Title V Permit
16. 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, 2520, 4301, 4305, 4306, 4320, 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, 4320, 4801 and Kern County Rules 424 and 425] Federally Enforceable Through Title V Permit
18. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NOx (as NO2): 49.0 lb/day or 9,461 lb/year, or CO: 43.2 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
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 Rules 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, 4306, and 4320] 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, 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

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

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, 4306, and 4320] Federally Enforceable Through Title V Permit
23. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 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, 4306, and 4320] 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. Source testing to measure natural gas-combustion NO_x 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
26. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. 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
28. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (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, SO_x (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
29. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
30. Operator shall provide an annual fuel sulfur content analysis to the District upon request. [District Rule 4320] Federally Enforceable Through Title V Permit
31. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
32. All equipment, facilities, or systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions. [PSD SJ 89-01] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

33. The Regional Administrator shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in the conditions below. In addition, the Regional Administrator shall be notified in writing within 15 days of any such failure. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
34. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed under the conditions below, and the methods utilized to restore normal operations. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
35. Facility shall operate this unit in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, State and local air quality regulations. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
36. This unit shall be equipped with oxygen controls, low NOx burner, and a flue gas recirculation system for the control of NOx emissions. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
37. Facility shall conduct annual performance tests for NOx and PM10 and furnish the EPA a written report of the results of such tests. The tests shall be conducted at the maximum operating capacity of the unit. Upon written request from the operator, EPA may approve the conducting of performance tests at a lower specified operating capacity. Upon written request and adequate justification, EPA may waive annual testing requirements for this unit. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
38. Performance tests for NOx and PM10 shall be conducted and the results reported in accordance with the test methods in 40 CFR 60, Part 60.8 and Appendix A. The following test methods shall be used: NOx - EPA methods 1 through 4 (lb/hr), and 7E (ppmv), PM10 - EPA Methods 1 through 5. Equivalent test methods may be used with prior written approval from the EPA. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
39. EPA shall be notified in writing at least 30 days prior to performance tests. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
40. For performance test purposes, sampling ports, platforms, and access shall be provided by the operator at each exhaust system in accordance with 40 CFR 60.8(e). [PSD SJ 89-01] Federally Enforceable Through Title V Permit
41. Operations during periods of startup, shutdown and malfunction shall not constitute representative conditions for the purpose of a performance test. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
42. Field or casing head gas will be sweetened as required to limit the sulfur content of the fuel to 75 gr/scf. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
43. Operator shall record hours of operation and amounts and types of fuel fired each calendar quarter. All information shall be recorded in a form suitable for inspection. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
44. Emission rates shall not exceed any of the following: PM10: 0.303 lb/hr, NOx: 2.71 lb/hr or 35 ppmv dry, @ 3% O2. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
45. Visible emissions shall not exceed « Ringelmann or 10% opacity. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
46. Any relaxation in the District's Determination of Compliance conditions, Authority to Construct conditions, Permit to Operate conditions, or any other subsequent permit of legally binding document that could result in an increase of the potential to emit of any pollutant from this source above the PSD applicability thresholds will require a full PSD review of the source as if construction had not yet begun. [PSD SJ 89-01] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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47. Facility shall have legal and operational responsibility and control of all air pollutant emitting activities of the MOCO TEOR project. This responsibility shall include, but not limited to: operating and maintaining the project to comply with all federal, state and local air pollution laws, regulations, permits, orders and other requirements; ensuring the emissions offsets or other reductions required for this project under permits issued by the District are obtained as required; any violation of any air pollution requirements are the legal responsibility of the facility in addition to any other legally responsible parties. Any proposed change to this condition shall require the prior written concurrence of the EPA. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
48. Facility is required to implement the conditions required by the U.S. Fish and Wildlife Service, as outlined in their Biological Opinion and Formal Consultation Response (August 30, 1990), to prevent the incidental taking (killing, harming or harassment) of endangered species that may be affected by this unit. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
49. All correspondence as required by this permit shall be forwarded to: a) Director, Air Management Division, Compliance Section (Attn: A-3-3), EPA Region IX, 75 Hawthorne Street, San Francisco, CA, 94105; b) Chief, Stationary Source Control Division, California Air Resource Board, P.O. Box 2815, Sacramento, CA, 95814; and c) Director, SJVUAPCD, 1990 East Gettysburg, Fresno, CA, 93726. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
50. Note: Formerly S-1511-138
51. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
52. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-801-10

EXPIRATION DATE: 05/31/2016

SECTION: SE14 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH COEN QLN-ULN BURNER AND FLUE GAS RECIRCULATION (SHALE #6, NORTH MIDWAY)

PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. 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 Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 4468, D 4084, D3246 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
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 Rules 4305, 6.2 and 4306, 6.2] 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. Only natural gas shall be used as fuel in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Annual heat input to steam generator shall not exceed 525.6 billion Btu hhv. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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9. 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
10. 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): 0.018 lb/MMBtu or 15 ppmv @ 3% O2, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O2. [District Rules 2201; 4305, 5.1 and 4306, 5.1] Federally Enforceable Through Title V Permit
11. 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 4301, 5.2; 4405, 5.2; 4406, 4.2 and 4801, 3.1] Federally Enforceable Through Title V Permit
12. Steam generator shall be equipped with operational fuel gas volumetric flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Emission rates shall not exceed any of the following: VOC: 7.5 lb/day, NOx (as NO2): 51.0 lb/day or 9461 lb/year, or CO: 45.0 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
14. Duration of startup and shutdown (as defined in Rule 4306) 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, 5.5 and 4306, 5.3] Federally Enforceable Through Title V Permit
15. 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
16. If 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 the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
17. 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, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
18. 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 and 4306, 5.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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19. 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. 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 4306. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
20. 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 and 4306, 6.3] Federally Enforceable Through Title V Permit
21. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
22. 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
23. 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, 6.1; 4305, 6.2 and 4305, 6.2] Federally Enforceable Through Title V Permit
24. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
25. 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, 4.0; 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
26. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1; 4306, 6.1 and Rule 4320, 6.1] Federally Enforceable Through Title V Permit
27. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320, 5.1 and 5.3] Federally Enforceable Through Title V Permit
28. Formerly S-1511-171
29. All equipment, facilities, or systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
30. The Regional Administrator shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in the conditions below. In addition, the Regional Administrator shall be notified in writing within 15 days of any such failure. [PSD SJ 89-02] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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31. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed under the conditions below, and the methods utilized to restore normal operations. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
32. Facility shall operate this unit in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, State and local air quality regulations. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
33. This unit shall be equipped with oxygen controls, low NOx burner, and a flue gas recirculation system for the control of NOx emissions. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
34. Facility shall conduct annual performance tests for NOx and PM10 and furnish the EPA a written report of the results of such tests. The tests shall be conducted at the maximum operating capacity of the unit. Upon written request from the operator, EPA may approve the conducting of performance tests at a lower specified operating capacity. Upon written request and adequate justification, EPA may waive annual testing requirements for this unit. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
35. Performance tests for NOx and PM10 shall be conducted and the results reported in accordance with the test methods in 40 CFR 60, Part 60.8 and Appendix A. The following test methods shall be used: NOx - EPA methods 1 through 4 (lb/hr), and 7E (ppmv), PM10 - EPA Methods 1 through 5. Equivalent test methods may be used with prior written approval from the EPA. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
36. EPA shall be notified in writing at least 30 days prior to performance tests. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
37. For performance test purposes, sampling ports, platforms, and access shall be provided by the operator at each exhaust system in accordance with 40 CFR 60.8(e). [PSD SJ 89-02] Federally Enforceable Through Title V Permit
38. Operations during periods of startup, shutdown and malfunction shall not constitute representative conditions for the purpose of a performance test. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
39. Only natural gas may be fired by this unit. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
40. Field gas will be sweetened as required to limit the sulfur content of the fuel to 75 gr/scf. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
41. Operator shall record hours of operation and amounts and types of fuel fired each calendar quarter. All information shall be recorded in a form suitable for inspection. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
42. Emission rates shall not exceed any of the following: PM10: 0.303 lb/hr, NOx: 2.71 lb/hr or 35 ppmv dry, @ 3% O2. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
43. Visible emissions shall not exceed « Ringelmann or 10% opacity. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
44. Any relaxation in the District's Determination of Compliance conditions, Authority to Construct conditions, Permit to Operate conditions, or any other subsequent permit of legally binding document that could result in an increase of the potential to emit of any pollutant from this source above the PSD applicability thresholds will require a full PSD review of the source as if construction had not yet begun. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
45. Facility shall have legal and operational responsibility and control of all air pollutant emitting activities of the MOCO TEOR project. This responsibility shall include, but not limited to: operating and maintaining the project to comply with all federal, state and local air pollution laws, regulations, permits, orders and other requirements; ensuring the emissions offsets or other reductions required for this project under permits issued by the District are obtained as required; any violation of any air pollution requirements are the legal responsibility of the facility in addition to any other legally responsible parties. Any proposed change to this condition shall require the prior written concurrence of the EPA. [PSD SJ 89-02] Federally Enforceable Through Title V Permit

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

46. Facility is required to implement the conditions required by the U.S. Fish and Wildlife Service, as outlined in their Biological Opinion and Formal Consultation Response (August 30, 1990), to prevent the incidental taking (killing, harming or harassment) of endangered species that may be affected by this unit. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
47. All correspondence as required by this permit shall be forwarded to: a) Director, Air Management Division, Compliance Section (Attn: A-3-3), EPA Region IX, 75 Hawthorne Street, San Francisco, CA, 94105; b) Chief, Stationary Source Control Division, California Air Resource Board, P.O. Box 2815, Sacramento, CA, 95814; and c) Director, SJVUAPCD, 1990 East Gettysburg, Fresno, CA, 93726. [PSD SJ 89-02] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-805-12

EXPIRATION DATE: 05/31/2016

SECTION: SE14 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH COEN QLN-ULN LOW NOX BURNER AND FLUE GAS RECIRCULATION (FINLEY #9, NORTH MIDWAY)

PERMIT UNIT REQUIREMENTS

1. Copies of all fuel invoices showing quantity and delivery points of supplier-certified gas delivered and copies of quality terms of supplier-certified 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
2. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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
3. 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 Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D3246 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
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 Rules 4305, 6.2 and 4306, 6.2] 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. Steam generator shall be equipped with operational fuel gas volumetric flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Only natural gas shall be used as fuel in this steam generator. [District Rule 2201; PSD SJ 89-02] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

9. Annual heat input to steam generator shall not exceed 525.6 billion BTU hhv. [District Rule 2201] Federally Enforceable Through Title V Permit
- ~~10. 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): 0.018 lb/MMBtu or 15 ppmv @ 3% O2, or CO: 50 ppmv @ 3% O2. [District Rules 2201; 4305, 5.1 and 4306, 5.1] Federally Enforceable Through Title V Permit~~
11. Emission rates during 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 4201, 3.0; 4301, 5.2; 4405, 5.2; 4406, 4.2 and 4801, 3.1] Federally Enforceable Through Title V Permit
12. 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
13. Duration of startup and shutdown (as defined in Rule 4306) 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, 5.5 and 4306, 5.3] Federally Enforceable Through Title V Permit .
14. 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
15. 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 the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
16. 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
17. 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, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit

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

18. All emissions measurements for NOx and CO shall be made with the unit operating either at conditions representative of normal operations or conditions 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 4306. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
19. 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 and 4306, 6.3] Federally Enforceable Through Title V Permit
20. 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
21. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
22. 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, 6.1; 4305, 6.2 and 4305, 6.2] Federally Enforceable Through Title V Permit
23. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
24. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
25. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1; 4306, 6.1 and Rule 4320, 6.1] Federally Enforceable Through Title V Permit
26. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320, 5.1 and 5.3] Federally Enforceable Through Title V Permit
27. All equipment, facilities, or systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
28. The Regional Administrator shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in the conditions below. In addition, the Regional Administrator shall be notified in writing within 15 days of any such failure. [PSD SJ 89-02] Federally Enforceable Through Title V Permit

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

29. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed under the conditions below, and the methods utilized to restore normal operations. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
30. Facility shall operate this unit in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, State and local air quality regulations. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
31. This unit shall be equipped with oxygen controls, low NOx burner, and a flue gas recirculation system for the control of NOx emissions. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
32. Facility shall conduct annual performance tests for NOx and PM10 and furnish the EPA a written report of the results of such tests. The tests shall be conducted at the maximum operating capacity of the unit. Upon written request from the operator, EPA may approve the conducting of performance tests at a lower specified operating capacity. Upon written request and adequate justification, EPA may waive annual testing requirements for this unit. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
33. Performance tests for NOx and PM10 shall be conducted and the results reported in accordance with the test methods in 40 CFR 60, Part 60.8 and Appendix A. The following test methods shall be used: NOx - EPA methods 1 through 4, 7E and 20, PM10 - EPA Methods 1 through 5. Equivalent test methods may be used with prior written approval from the EPA. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
34. EPA shall be notified in writing at least 30 days prior to performance tests. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
35. For performance test purposes, sampling ports, platforms, and access shall be provided by the operator at each exhaust system in accordance with 40 CFR 60.8(e). [PSD SJ 89-02] Federally Enforceable Through Title V Permit
36. Operations during periods of startup, shutdown and malfunction shall not constitute representative conditions for the purpose of a performance test. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
37. Field gas will be sweetened as required to limit the sulfur content of the fuel to 75 gr/scf. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
38. Operator shall record hours of operation and amounts and types of fuel fired each calendar quarter. All information shall be recorded in a form suitable for inspection. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
39. Emission rates shall not exceed any of the following: PM10: 0.303 lb/hr, NOx: 2.71 lb/hr or 35 ppmv dry, @ 3% O2. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
40. Visible emissions shall not exceed « Ringelmann or 10% opacity. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
41. Any relaxation in the District's Determination of Compliance conditions, Authority to Construct conditions, Permit to Operate conditions, or any other subsequent permit of legally binding document that could result in an increase of the potential to emit of any pollutant from this source above the PSD applicability thresholds will require a full PSD review of the source as if construction had not yet begun. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
42. Facility shall have legal and operational responsibility and control of all air pollutant emitting activities of the MOCO TEOR project. This responsibility shall include, but not limited to: operating and maintaining the project to comply with all federal, state and local air pollution laws, regulations, permits, orders and other requirements; ensuring the emissions offsets or other reductions required for this project under permits issued by the District are obtained as required; any violation of any air pollution requirements are the legal responsibility of the facility in addition to any other legally responsible parties. Any proposed change to this condition shall require the prior written concurrence of the EPA. [PSD SJ 89-02] Federally Enforceable Through Title V Permit

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

43. Facility is required to implement the conditions required by the U.S. Fish and Wildlife Service, as outlined in their Biological Opinion and Formal Consultation Response (August 30, 1990), to prevent the incidental taking (killing, harming or harassment) of endangered species that may be affected by this unit. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
44. All correspondence as required by this permit shall be forwarded to: a) Director, Air Management Division, Compliance Section (Attn: A-3-3), EPA Region IX, 75 Hawthorne Street, San Francisco, CA, 94105; b) Chief, Stationary Source Control Division, California Air Resource Board, P.O. Box 2815, Sacramento, CA, 95814; and c) Director, SJVUAPCD, 1990 East Gettysburg, Fresno, CA, 93726. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
45. Formerly S-1511-186

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-806-10

EXPIRATION DATE: 05/31/2016

SECTION: SE14 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS FIRED STEAM GENERATOR WITH COEN ULN LOW NOX BURNER AND FLUE GAS RECIRCULATION (FINLEY #10, NORTH MIDWAY)

PERMIT UNIT REQUIREMENTS

1. Copies of all fuel invoices showing quantity and delivery points of supplier-certified gas delivered and copies of quality terms of supplier-certified 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
2. 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
3. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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
4. 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 Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
5. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D3246 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rules 4305, 6.2 and 4306, 6.2] 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 Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
7. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), 4301 (Amended December 17, 1992), 4406 (Amended December 17, 1992, and Rule 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

8. 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 equipped with an operational fuel gas volumetric flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Only natural gas shall be used as fuel in this steam generator. [District Rule 2201; PSD SJ 89-02] Federally Enforceable Through Title V Permit
11. Annual heat input to steam generator shall not exceed 525.6 billion BTU hhv. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following: PM10: 0.005 lb/MMBtu, SO_x (as SO₂): 0.002 lb/MMBtu, VOC: 0.003 lb/MMBtu, NO_x (as NO₂): 0.018 lb/MMBtu or 15 ppmv @ 3% O₂, or CO: 50 ppmv @ 3% O₂. [District Rules 2201; 4305, 5.5 and 4306, 5.1] Federally Enforceable Through Title V Permit
13. Emission rates during 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 4201, 3.0; 4301, 5.2; 4405, 5.2; 4406, 4.2 and 4801, 3.1] Federally Enforceable Through Title V Permit
14. PM-10 and SO₂ daily emission limits, when unit incinerates scrubbed non-condensable gas, shall be quantified on the mass balance basis on permit S-1547-822 for all steam generators authorized to incinerate scrubbed non-condensable gas. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Duration of startup and shutdown (as defined in Rule 4306) 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, 5.5 and 4306, 5.3] Federally Enforceable Through Title V Permit
17. The permittee shall monitor and record the stack concentration of NO_x, 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. Measurement shall be made with the FGR system in the mode of operation (closed or open) in which it was used in the preceding 30 days. 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
18. If either the NO_x 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 and 4306, 5.4] Federally Enforceable Through Title V Permit

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

19. 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
20. During the 36-month source testing interval the operator shall tune the unit at least twice per calendar year, (from four to eight months apart) by a qualified technician in accordance with the procedure described in Rule 4304, and shall monitor, on a monthly basis, the unit's operational characteristics recommended by the manufacturer. Semi-annual tuning is not required if emissions are monitored monthly with a portable analyzer. [District Rules 4305, 6.3 and 4306, 6.3] Federally Enforceable Through Title V Permit
21. All emissions measurements for NOx and CO shall be made with the unit operating either at conditions representative of normal operations or conditions 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 4306. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
22. 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). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. 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 Rule 2201 and District Rules 4305, 6.3 and 4306, 6.3] Federally Enforceable Through Title V Permit
23. 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] Federally Enforceable Through Title V Permit
24. 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
25. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
26. 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) - EPA Method 6 or 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D4084 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - D1826 or D1945 in conjunction with ASTM D3588. [District Rules 1081, 6.1, 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
27. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
28. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
29. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1; 4306, 6.1 and Rule 4320, 6.1] Federally Enforceable Through Title V Permit

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

30. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320, 5.1 and 5.3] Federally Enforceable Through Title V Permit
31. Formerly S-1511-187
32. All equipment, facilities, or systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
33. The Regional Administrator shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in the conditions below. In addition, the Regional Administrator shall be notified in writing within 15 days of any such failure. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
34. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed under the conditions below, and the methods utilized to restore normal operations. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
35. Facility shall operate this unit in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, State and local air quality regulations. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
36. This unit shall be equipped with oxygen controls, low NOx burner, and a flue gas recirculation system for the control of NOx emissions. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
37. Facility shall conduct annual performance tests for NOx and PM10 and furnish the EPA a written report of the results of such tests. The tests shall be conducted at the maximum operating capacity of the unit. Upon written request from the operator, EPA may approve the conducting of performance tests at a lower specified operating capacity. Upon written request and adequate justification, EPA may waive annual testing requirements for this unit. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
38. Performance tests for NOx and PM10 shall be conducted and the results reported in accordance with the test methods in 40 CFR 60, Part 60.8 and Appendix A. The following test methods shall be used: NOx - EPA methods 1 through 4, 7E and 20, PM10 - EPA Methods 1 through 5. Equivalent test methods may be used with prior written approval from the EPA. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
39. EPA shall be notified in writing at least 30 days prior to performance tests. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
40. For performance test purposes, sampling ports, platforms, and access shall be provided by the operator at each exhaust system in accordance with 40 CFR 60.8(e). [PSD SJ 89-02] Federally Enforceable Through Title V Permit
41. Operations during periods of startup, shutdown and malfunction shall not constitute representative conditions for the purpose of a performance test. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
42. Field or casing head gas will be sweetened as required to limit the sulfur content of the fuel to 75 gr/scf. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
43. Operator shall record hours of operation and amounts and types of fuel fired each calendar quarter. All information shall be recorded in a form suitable for inspection. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
44. Emission rates shall not exceed any of the following: PM10: 0.303 lb/hr, NOx: 2.71 lb/hr or 35 ppmv dry, @ 3% O2. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
45. Visible emissions shall not exceed « Ringelmann or 10% opacity. [PSD SJ 89-02] Federally Enforceable Through Title V Permit

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

46. Any relaxation in the District's Determination of Compliance conditions, Authority to Construct conditions, Permit to Operate conditions, or any other subsequent permit of legally binding document that could result in an increase of the potential to emit of any pollutant from this source above the PSD applicability thresholds will require a full PSD review of the source as if construction had not yet begun. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
47. Facility shall have legal and operational responsibility and control of all air pollutant emitting activities of the MOCO TEOR project. This responsibility shall include, but not limited to: operating and maintaining the project to comply with all federal, state and local air pollution laws, regulations, permits, orders and other requirements; ensuring the emissions offsets or other reductions required for this project under permits issued by the District are obtained as required; any violation of any air pollution requirements are the legal responsibility of the facility in addition to any other legally responsible parties. Any proposed change to this condition shall require the prior written concurrence of the EPA. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
48. Facility is required to implement the conditions required by the U.S. Fish and Wildlife Service, as outlined in their Biological Opinion and Formal Consultation Response (August 30, 1990), to prevent the incidental taking (killing, harming or harassment) of endangered species that may be affected by this unit. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
49. All correspondence as required by this permit shall be forwarded to: a) Director, Air Management Division, Compliance Section (Attn: A-3-3), EPA Region IX, 75 Hawthorne Street, San Francisco, CA, 94105; b) Chief, Stationary Source Control Division, California Air Resource Board, P.O. Box 2815, Sacramento, CA, 95814; and c) Director, SJVUAPCD, 1990 East Gettysburg, Fresno, CA, 93726. [PSD SJ 89-02] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-812-11

EXPIRATION DATE: 05/31/2016

SECTION: SE35 TOWNSHIP: 12N RANGE: 24W

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS (AND VAPOR RECOVERY GAS) FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN BURNER AND FLUE GAS RECIRCULATION (MOCO #807) (SOUTH MIDWAY)

PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. 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 Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 4468, D 4084, D3246 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
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 Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
6. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), 4301 (Amended December 17, 1992), 4406 (Amended December 17, 1992, and Rule 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
7. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

8. Steam generator shall be equipped with operational fuel gas volumetric flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Steam generator shall be equipped with operational vapor recovery gas volumetric flow meter whenever unit is connected to the vapor recovery gas supply. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Unit may be disconnected (or reconnected) at the vapor recovery gas supply and the vapor recovery gas volumetric flow meter removed (or replaced). Permittee shall keep a written record of the date(s) when the unit is disconnected (or reconnected) at the vapor recovery gas supply and the vapor recovery gas volumetric flow meter is removed (or replaced). [District Rule 1080] Federally Enforceable Through Title V Permit
11. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following limits: PM10: 0.005 lb/MMBtu, SOx (as SO2): 0.002 lb/MMBtu, 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; 4305, 5.1 and 4306, 5.1] Federally Enforceable Through Title V Permit
13. 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 4201, 3.0; 4301, 5.2; 4405, 5.2; 4406, 4.2 and 4801, 3.1] Federally Enforceable Through Title V Permit
14. 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): 51.0 lb/day or 9855 lb/year, or CO: 45.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. 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, 5.5; 4306, 5.3 and 4320, 5.6] Federally Enforceable Through Title V Permit
16. 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
17. If 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 the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit

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

18. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
19. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
20. 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. 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 4306. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
21. Source testing to measure natural gas-combustion NO_x 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 and 4306, 6.3] Federally Enforceable Through Title V Permit
22. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
23. 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
24. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (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, SO_x (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 Rules 1081; 4305, 6.2; and 4306, 6.2] Federally Enforceable Through Title V Permit
25. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
26. 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 and 4306, 6.1] Federally Enforceable Through Title V Permit
27. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1; 4306, 6.1 and Rule 4320, 6.1] Federally Enforceable Through Title V Permit

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

28. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320, 5.1 and 5.3] Federally Enforceable Through Title V Permit
29. All equipment, facilities, or systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
30. The Regional Administrator shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in the conditions below. In addition, the Regional Administrator shall be notified in writing within 15 days of any such failure. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
31. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed under the conditions below, and the methods utilized to restore normal operations. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
32. Facility shall operate this unit in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, State and local air quality regulations. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
33. This unit shall be equipped with oxygen controls, low NOx burner, and a flue gas recirculation system for the control of NOx emissions. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
34. Facility shall conduct annual performance tests for NOx and PM10 and furnish the EPA a written report of the results of such tests. The tests shall be conducted at the maximum operating capacity of the unit. Upon written request from the operator, EPA may approve the conducting of performance tests at a lower specified operating capacity. Upon written request and adequate justification, EPA may waive annual testing requirements for this unit. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
35. Performance tests for NOx and PM10 shall be conducted and the results reported in accordance with the test methods in 40 CFR 60, Part 60.8 and Appendix A. The following test methods shall be used: NOx - EPA methods 1 through 4 (lb/hr), and 7E (ppmv), PM10 - EPA Methods 1 through 5. Equivalent test methods may be used with prior written approval from the EPA. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
36. EPA shall be notified in writing at least 30 days prior to performance tests. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
37. For performance test purposes, sampling ports, platforms, and access shall be provided by the operator at each exhaust system in accordance with 40 CFR 60.8(e). [PSD SJ 89-01] Federally Enforceable Through Title V Permit
38. Operations during periods of startup, shutdown and malfunction shall not constitute representative conditions for the purpose of a performance test. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
39. Only natural gas or a combination of natural gas and field or casing head gas may be fired by this unit. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
40. Field or casing head gas will be sweetened as required to limit the sulfur content of the fuel to 75 gr/scf. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
41. Operator shall record hours of operation and amounts and types of fuel fired each calendar quarter. All information shall be recorded in a form suitable for inspection. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
42. Emission rates shall not exceed any of the following: PM10: 0.303 lb/hr, NOx: 2.71 lb/hr or 35 ppmv dry, @ 3% O2. [PSD SJ 89-01] Federally Enforceable Through Title V Permit

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

43. Visible emissions shall not exceed « Ringelmann or 10% opacity. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
44. Any relaxation in the District's Determination of Compliance conditions, Authority to Construct conditions, Permit to Operate conditions, or any other subsequent permit of legally binding document that could result in an increase of the potential to emit of any pollutant from this source above the PSD applicability thresholds will require a full PSD review of the source as if construction had not yet begun. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
45. Facility shall have legal and operational responsibility and control of all air pollutant emitting activities of the MOCO TEOR project. This responsibility shall include, but not limited to: operating and maintaining the project to comply with all federal, state and local air pollution laws, regulations, permits, orders and other requirements; ensuring the emissions offsets or other reductions required for this project under permits issued by the District are obtained as required; any violation of any air pollution requirements are the legal responsibility of the facility in addition to any other legally responsible parties. Any proposed change to this condition shall require the prior written concurrence of the EPA. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
46. Facility is required to implement the conditions required by the U.S. Fish and Wildlife Service, as outlined in their Biological Opinion and Formal Consultation Response (August 30, 1990), to prevent the incidental taking (killing, harming or harassment) of endangered species that may be affected by this unit. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
47. All correspondence as required by this permit shall be forwarded to: a) Director, Air Management Division, Compliance Section (Attn: A-3-3), EPA Region IX, 75 Hawthorne Street, San Francisco, CA, 94105; b) Chief, Stationary Source Control Division, California Air Resource Board, P.O. Box 2815, Sacramento, CA, 95814; and c) Director, SJVUAPCD, 1990 East Gettysburg, Fresno, CA, 93726. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
48. Formerly S-1511-194

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-827-10

EXPIRATION DATE: 05/31/2016

SECTION: SE14 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH COEN ULN LOW NOX BURNER AND FLUE GAS RECIRCULATION (FGR) SYSTEM [FINLEY #11, NORTH MIDWAY]

PERMIT UNIT REQUIREMENTS

1. Copies of all fuel invoices showing quantity and delivery points of supplier-certified gas delivered and copies of quality terms of supplier-certified 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
2. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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
3. 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 Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D3246 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
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 Rules 4305, 6.2 and 4306, 6.2] 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. Steam generator shall be equipped with operational fuel gas volumetric flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Annual heat input to steam generator shall not exceed 525.6 billion Btu hhv. [District Rule 2201] Federally Enforceable Through Title V Permit

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

9. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following: PM10: 0.008 lb/MMBtu, SOx (as SO2): 0.003 lb/MMBtu, VOC: 0.003 lb/MMBtu, NOx (as NO2): 0.018 lb/MMBtu or 15 ppmv @ 3% O2, or CO: 50 ppmv @ 3% O2. [District Rules 2201, 4305, 5.1 and 4306, 5.1] Federally Enforceable Through Title V Permit
10. Emission rates during 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 4201, 3.0; 4301, 5.2; 4405, 5.2; 4406, 4.2 and 4801, 3.1] Federally Enforceable Through Title V Permit
11. 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
12. Duration of startup and shutdown (as defined in Rule 4306) 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, 5.5 and 4306, 5.3] Federally Enforceable Through Title V Permit
13. 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. Measurement shall be made with the FGR system in the mode of operation (closed or open) in which it was used in the preceding 30 days. 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
14. If the NOx and/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, 5.4 and 4306, 6.4] Federally Enforceable Through Title V Permit
15. 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
16. All emissions measurements for NOx and CO shall be made with the unit operating either at conditions representative of normal operations or conditions 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 4306. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

17. 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 and 4306, 6.3] Federally Enforceable Through Title V Permit
18. 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
19. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
20. 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, 6.1; 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
21. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
22. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
23. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1; 4306, 6.1 and Rule 4320, 6.1] Federally Enforceable Through Title V Permit
24. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320, 5.1 and 5.3] Federally Enforceable Through Title V Permit
25. Formerly S-1511-239
26. All equipment, facilities, or systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
27. The Regional Administrator shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in the conditions below. In addition, the Regional Administrator shall be notified in writing within 15 days of any such failure. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
28. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed under the conditions below, and the methods utilized to restore normal operations. [PSD SJ 89-02] Federally Enforceable Through Title V Permit

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

29. Facility shall operate this unit in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, State and local air quality regulations. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
30. This unit shall be equipped with oxygen controls, low NOx burner, and a flue gas recirculation system for the control of NOx emissions. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
31. Facility shall conduct annual performance tests for NOx and PM10 and furnish the EPA a written report of the results of such tests. The tests shall be conducted at the maximum operating capacity of the unit. Upon written request from the operator, EPA may approve the conducting of performance tests at a lower specified operating capacity. Upon written request and adequate justification, EPA may waive annual testing requirements for this unit. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
32. Performance tests for NOx and PM10 shall be conducted and the results reported in accordance with the test methods in 40 CFR 60, Part 60.8 and Appendix A. The following test methods shall be used: NOx - EPA methods 1 through 4, 7E and 20, PM10 - EPA Methods 1 through 5. Equivalent test methods may be used with prior written approval from the EPA. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
33. EPA shall be notified in writing at least 30 days prior to performance tests. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
34. For performance test purposes, sampling ports, platforms, and access shall be provided by the operator at each exhaust system in accordance with 40 CFR 60.8(e). [PSD SJ 89-02] Federally Enforceable Through Title V Permit
35. Operations during periods of startup, shutdown and malfunction shall not constitute representative conditions for the purpose of a performance test. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
36. Only natural gas may be fired by this unit. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
37. Field gas will be sweetened as required to limit the sulfur content of the fuel to 75 gr/scf. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
38. Operator shall record hours of operation and amounts and types of fuel fired each calendar quarter. All information shall be recorded in a form suitable for inspection. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
39. Emission rates shall not exceed any of the following: PM10: 0.303 lb/hr, NOx: 2.71 lb/hr or 35 ppmv dry, @ 3% O2. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
40. Visible emissions shall not exceed « Ringelmann or 10% opacity. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
41. Any relaxation in the District's Determination of Compliance conditions, Authority to Construct conditions, Permit to Operate conditions, or any other subsequent permit of legally binding document that could result in an increase of the potential to emit of any pollutant from this source above the PSD applicability thresholds will require a full PSD review of the source as if construction had not yet begun. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
42. Facility shall have legal and operational responsibility and control of all air pollutant emitting activities of the MOCO TEOR project. This responsibility shall include, but not limited to: operating and maintaining the project to comply with all federal, state and local air pollution laws, regulations, permits, orders and other requirements; ensuring the emissions offsets or other reductions required for this project under permits issued by the District are obtained as required; any violation of any air pollution requirements are the legal responsibility of the facility in addition to any other legally responsible parties. Any proposed change to this condition shall require the prior written concurrence of the EPA. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
43. Facility is required to implement the conditions required by the U.S. Fish and Wildlife Service, as outlined in their Biological Opinion and Formal Consultation Response (August 30, 1990), to prevent the incidental taking (killing, harming or harassment) of endangered species that may be affected by this unit. [PSD SJ 89-02] Federally Enforceable Through Title V Permit

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

44. All correspondence as required by this permit shall be forwarded to: a) Director, Air Management Division, Compliance Section (Attn: A-3-3), EPA Region IX, 75 Hawthorne Street, San Francisco, CA, 94105; b) Chief, Stationary Source Control Division, California Air Resource Board, P.O. Box 2815, Sacramento, CA, 95814; and c) Director, SJVUAPCD, 1990 East Gettysburg, Fresno, CA, 93726. [PSD SJ 89-02] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-828-10

EXPIRATION DATE: 05/31/2016

SECTION: SE14 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH COEN ULN LOW NOX BURNER AND FLUE GAS RECIRCULATION (FINLEY #12, NORTH MIDWAY)

PERMIT UNIT REQUIREMENTS

1. Copies of all fuel invoices showing quantity and delivery points of supplier-certified gas delivered and copies of quality terms of supplier-certified 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
2. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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
3. 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 Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D3246 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
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 Rules 4305, 6.2 and 4306, 6.2] 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. Duration of start-up and shutdown (as defined in Rule 4306) shall not exceed 2 hours each per occurrence. [District Rules 4305, 5.5 and 4306, 5.3] Federally Enforceable Through Title V Permit
8. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

9. Permittee shall maintain records of duration of each start-up, shutdown and refractory curing, per a period of five years and make such records readily available for District inspection upon request. [District Rule 2080; 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
10. Steam generator shall be equipped with operational fuel gas volumetric flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Annual heat input to steam generator shall not exceed 525.6 billion Btu hhv. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following: PM10: 0.008 lb/MMBtu, SO_x (as SO₂): 0.003 lb/MMBtu, VOC: 0.003 lb/MMBtu, NO_x (as NO₂): 0.018 lb/MMBtu or 15 ppmv @ 3% O₂, or CO: 50 ppmv @ 3% O₂. [District Rules 2201; 4305, 5.1 and 4306, 5.1] Federally Enforceable Through Title V Permit
13. Emission rates during 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 4201, 3.0; 4301, 5.2; 4405, 5.2; 4406, 4.2 and 4801, 3.1] Federally Enforceable Through Title V Permit
14. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Permittee shall monitor and record the stack concentration of NO_x, 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. Measurement shall be made with the FGR system in the mode of operation (closed or open) in which it was used in the preceding 30 days. 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
16. If either the NO_x 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
17. Permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
18. During the 36-month source testing interval the operator shall tune the unit at least twice per calendar year, (from four to eight months apart) by a qualified technician in accordance with the procedure described in Rule 4304, and shall monitor, on a monthly basis, the unit's operational characteristics recommended by the manufacturer. Semi-annual tuning is not required if emissions are monitored monthly with a portable analyzer. [District Rules 4305, 6.3 and 4306, 6.3] Federally Enforceable Through Title V Permit

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

19. All emissions measurements for NOx and CO shall be made with the unit operating either at conditions representative of normal operations or conditions 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 4306. [District Rules 4305, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
20. 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 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. 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 and 4306, 6.3] Federally Enforceable Through Title V Permit
21. 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 Rules 1070 and 2201] Federally Enforceable Through Title V Permit
22. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
23. 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, 7.1] Federally Enforceable Through Title V Permit
24. 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) - EPA Method 6 or 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D4084 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - D1826 or D1945 in conjunction with ASTM D3588. [District Rules 1081, 6.1; 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
25. 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
26. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
27. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1; 4306, 6.1 and Rule 4320, 6.1] Federally Enforceable Through Title V Permit
28. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320, 5.1 and 5.3] Federally Enforceable Through Title V Permit
29. Formerly S-1511-240
30. All equipment, facilities, or systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions. [PSD SJ 89-02] Federally Enforceable Through Title V Permit

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

31. The Regional Administrator shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in the conditions below. In addition, the Regional Administrator shall be notified in writing within 15 days of any such failure. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
32. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed under the conditions below, and the methods utilized to restore normal operations. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
33. Facility shall operate this unit in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, State and local air quality regulations. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
34. This unit shall be equipped with oxygen controls, low NOx burner, and a flue gas recirculation system for the control of NOx emissions. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
35. Facility shall conduct annual performance tests for NOx and PM10 and furnish the EPA a written report of the results of such tests. The tests shall be conducted at the maximum operating capacity of the unit. Upon written request from the operator, EPA may approve the conducting of performance tests at a lower specified operating capacity. Upon written request and adequate justification, EPA may waive annual testing requirements for this unit. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
36. Performance tests for NOx and PM10 shall be conducted and the results reported in accordance with the test methods in 40 CFR 60, Part 60.8 and Appendix A. The following test methods shall be used: NOx - EPA methods 1 through 4, 7E and 20, PM10 - EPA Methods 1 through 5. Equivalent test methods may be used with prior written approval from the EPA. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
37. EPA shall be notified in writing at least 30 days prior to performance tests. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
38. For performance test purposes, sampling ports, platforms, and access shall be provided by the operator at each exhaust system in accordance with 40 CFR 60.8(e). [PSD SJ 89-02] Federally Enforceable Through Title V Permit
39. Operations during periods of startup, shutdown and malfunction shall not constitute representative conditions for the purpose of a performance test. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
40. Only natural gas may be fired by this unit. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
41. Field or casing head gas will be sweetened as required to limit the sulfur content of the fuel to 75 gr/scf. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
42. Operator shall record hours of operation and amounts and types of fuel fired each calendar quarter. All information shall be recorded in a form suitable for inspection. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
43. Emission rates shall not exceed any of the following: PM10: 0.303 lb/hr, NOx: 2.71 lb/hr or 35 ppmv dry, @ 3% O2. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
44. Visible emissions shall not exceed « Ringelmann or 10% opacity. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
45. Any relaxation in the District's Determination of Compliance conditions, Authority to Construct conditions, Permit to Operate conditions, or any other subsequent permit of legally binding document that could result in an increase of the potential to emit of any pollutant from this source above the PSD applicability thresholds will require a full PSD review of the source as if construction had not yet begun. [PSD SJ 89-02] Federally Enforceable Through Title V Permit

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

46. Facility shall have legal and operational responsibility and control of all air pollutant emitting activities of the MOCO TEOR project. This responsibility shall include, but not limited to: operating and maintaining the project to comply with all federal, state and local air pollution laws, regulations, permits, orders and other requirements; ensuring the emissions offsets or other reductions required for this project under permits issued by the District are obtained as required; any violation of any air pollution requirements are the legal responsibility of the facility in addition to any other legally responsible parties. Any proposed change to this condition shall require the prior written concurrence of the EPA. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
47. Facility is required to implement the conditions required by the U.S. Fish and Wildlife Service, as outlined in their Biological Opinion and Formal Consultation Response (August 30, 1990), to prevent the incidental taking (killing, harming or harassment) of endangered species that may be affected by this unit. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
48. All correspondence as required by this permit shall be forwarded to: a) Director, Air Management Division, Compliance Section (Attn: A-3-3), EPA Region IX, 75 Hawthorne Street, San Francisco, CA, 94105; b) Chief, Stationary Source Control Division, California Air Resource Board, P.O. Box 2815, Sacramento, CA, 95814; and c) Director, SJVUAPCD, 1990 East Gettysburg, Fresno, CA, 93726. [PSD SJ 89-02] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-829-12

EXPIRATION DATE: 05/31/2016

SECTION: SE14 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER AND FLUE GAS RECIRCULATION (FGR) (FINLEY #13) (NORTH MIDWAY)

PERMIT UNIT REQUIREMENTS

1. Copies of all fuel invoices showing quantity and delivery points of supplier-certified gas delivered and copies of quality terms of supplier-certified 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
2. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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
3. When complying with SO_x 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 Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. If the unit is fired on noncertified gaseous fuel and compliance with SO_x emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D3246 or grab sample analysis by double GC for H₂S and mercaptans performed in the laboratory. [Districts 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
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 Rules 4305, 6.2 and 4306, 6.2] 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. Steam generator shall be equipped with operational fuel gas volumetric flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Annual heat input to steam generator shall not exceed 525.6 billion Btu hhv. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

9. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following PM10: 0.008 lb/MMBtu, SOx (as SO2): 0.003 lb/MMBtu, VOC: 0.003 lb/MMBtu, NOx (as NO2): 0.018 lb/MMBtu or 15 ppmv @ 3% O2, or CO: 50 ppmv @ 3% O2. [District Rules 2201, 4305, 5.1 and 4306, 5.1] Federally Enforceable Through Title V Permit
10. Emission rates, except during 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 4201, 3.0; 4301, 5.2; 4405, 5.2; 4406, 4.2 and 4801, 3.1] Federally Enforceable Through Title V Permit
11. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Duration of startup and shutdown (as defined in Rule 4306) 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, 5.5 and 4306, 5.3] Federally Enforceable Through Title V Permit
13. 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
14. 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
15. 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, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
16. 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
17. During the 36-month source testing interval the operator shall tune the unit at least twice per calendar year, (from four to eight months apart) by a qualified technician in accordance with the procedure described in Rule 4304, and shall monitor, on a monthly basis, the unit's operational characteristics recommended by the manufacturer. Semi-annual tuning is not required if emissions are monitored monthly with a portable analyzer. [District Rules 4305, 6.3 and 4306, 6.3] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

18. All emissions measurements for NOx and CO shall be made with the unit operating either at conditions representative of normal operations or conditions 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 4306. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
19. 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 Rule 2201 and District Rules 4305, 6.3 and 4306, 6.3] Federally Enforceable Through Title V Permit
20. 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 Rules 1070 and 2201] Federally Enforceable Through Title V Permit
21. 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, 7.1] Federally Enforceable Through Title V Permit
22. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
23. 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) - EPA Method 6 or 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D4084 or double GC for H2S and mercaptans performed in a laboratory, fuel gas hhv - D1826 or D1945 in conjunction with ASTM D3588. [District Rules 1081, 6.1; 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
24. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
25. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
26. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1; 4306, 6.1 and Rule 4320, 6.1] Federally Enforceable Through Title V Permit
27. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320, 5.1 and 5.3] Federally Enforceable Through Title V Permit
28. Formerly S-1511-241
29. All equipment, facilities, or systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions. [PSD SJ 89-02] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

30. The Regional Administrator shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in the conditions below. In addition, the Regional Administrator shall be notified in writing within 15 days of any such failure. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
31. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed under the conditions below, and the methods utilized to restore normal operations. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
32. Facility shall operate this unit in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, State and local air quality regulations. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
33. This unit shall be equipped with oxygen controls, low NOx burner, and a flue gas recirculation system for the control of NOx emissions. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
34. Facility shall conduct annual performance tests for NOx and PM10 and furnish the EPA a written report of the results of such tests. The tests shall be conducted at the maximum operating capacity of the unit. Upon written request from the operator, EPA may approve the conducting of performance tests at a lower specified operating capacity. Upon written request and adequate justification, EPA may waive annual testing requirements for this unit. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
35. Performance tests for NOx and PM10 shall be conducted and the results reported in accordance with the test methods in 40 CFR 60, Part 60.8 and Appendix A. The following test methods shall be used: NOx - EPA methods 1 through 4, 7E and 20, PM10 - EPA Methods 1 through 5. Equivalent test methods may be used with prior written approval from the EPA. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
36. EPA shall be notified in writing at least 30 days prior to performance tests. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
37. For performance test purposes, sampling ports, platforms, and access shall be provided by the operator at each exhaust system in accordance with 40 CFR 60.8(e). [PSD SJ 89-02] Federally Enforceable Through Title V Permit
38. Operations during periods of startup, shutdown and malfunction shall not constitute representative conditions for the purpose of a performance test. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
39. Only natural gas may be fired by this unit. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
40. Field or casing head gas will be sweetened as required to limit the sulfur content of the fuel to 75 gr/scf. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
41. Operator shall record hours of operation and amounts and types of fuel fired each calendar quarter. All information shall be recorded in a form suitable for inspection. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
42. Emission rates shall not exceed any of the following: PM10: 0.303 lb/hr, NOx: 2.71 lb/hr or 35 ppmv dry, @ 3% O2. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
43. Visible emissions shall not exceed « Ringelmann or 10% opacity. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
44. Any relaxation in the District's Determination of Compliance conditions, Authority to Construct conditions, Permit to Operate conditions, or any other subsequent permit of legally binding document that could result in an increase of the potential to emit of any pollutant from this source above the PSD applicability thresholds will require a full PSD review of the source as if construction had not yet begun. [PSD SJ 89-02] Federally Enforceable Through Title V Permit

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

45. Facility shall have legal and operational responsibility and control of all air pollutant emitting activities of the MOCO TEOR project. This responsibility shall include, but not limited to: operating and maintaining the project to comply with all federal, state and local air pollution laws, regulations, permits, orders and other requirements; ensuring the emissions offsets or other reductions required for this project under permits issued by the District are obtained as required; any violation of any air pollution requirements are the legal responsibility of the facility in addition to any other legally responsible parties. Any proposed change to this condition shall require the prior written concurrence of the EPA. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
46. Facility is required to implement the conditions required by the U.S. Fish and Wildlife Service, as outlined in their Biological Opinion and Formal Consultation Response (August 30, 1990), to prevent the incidental taking (killing, harming or harassment) of endangered species that may be affected by this unit. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
47. All correspondence as required by this permit shall be forwarded to: a) Director, Air Management Division, Compliance Section (Attn: A-3-3), EPA Region IX, 75 Hawthorne Street, San Francisco, CA, 94105; b) Chief, Stationary Source Control Division, California Air Resource Board, P.O. Box 2815, Sacramento, CA, 95814; and c) Director, SJVUAPCD, 1990 East Gettysburg, Fresno, CA, 93726. [PSD SJ 89-02] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-885-13

EXPIRATION DATE: 05/31/2016

SECTION: SE35 TOWNSHIP: 12N RANGE: 24W

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS (AND VAPOR RECOVERY GAS) FIRED STEAM GENERATOR WITH A COEN ULN BURNER AND FLUE GAS RECIRCULATION (MOCO #803) (SOUTH MIDWAY)

PERMIT UNIT REQUIREMENTS

1. Copies of all fuel invoices showing quantity and delivery points of supplier-certified gas delivered and copies of quality terms of supplier-certified 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
2. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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
3. When complying with SO_x 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 Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. If the unit is fired on noncertified gaseous fuel and compliance with SO_x emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D3246, D 4084, or grab sample analysis by double GC for H₂S and mercaptans performed in the laboratory. [District Rules 2520, 9.4.2; 4305, 6.2; and 4306, 6.2] Federally Enforceable Through Title V Permit
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 Rules 2520, 9.4.2; 4305, 6.2; and 4306, 6.2] 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. Steam generator shall be equipped with operational fuel gas volumetric flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Steam generator shall be equipped with operational vapor recovery gas volumetric flow meter whenever unit is connected to the vapor recovery gas supply. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

9. Unit may be disconnected (or reconnected) at the vapor recovery gas supply and the vapor recovery gas volumetric flow meter removed (or replaced). Permittee shall keep a written record of the date(s) when the unit is disconnected (or reconnected) at the vapor recovery gas supply and the vapor recovery gas volumetric flow meter is removed (or replaced). [District Rule 1080] Federally Enforceable Through Title V Permit
10. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following limits: PM10: 0.005 lb/MMBtu, SOx (as SO2): 0.002 lb/MMBtu, VOC: 0.003 lb/MMBtu, NOx (as NO2): 0.018 lb/MMBtu or 15 ppmv @ 3% O2, or CO: 50 ppmv @ 3% O2. [District Rule 2201; 4305, 5.1; and 4306, 5.1] Federally Enforceable Through Title V Permit
11. Emission rates during 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 4301, 5.2; 4405, 5.2; 4406, 4.2; and 4801, 3.1] Federally Enforceable Through Title V Permit
12. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Duration of startup and shutdown (as defined in Rule 4306) 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, 5.5 and 4306, 5.3] Federally Enforceable Through Title V Permit
14. 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
15. 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
16. 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, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
17. 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 and 4306, 5.4] Federally Enforceable Through Title V Permit

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

18. 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 Rule 4306. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
19. 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 and 4306, 6.3] Federally Enforceable Through Title V Permit
20. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
21. 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
22. 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, 6.1; 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
23. 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 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
24. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 2201 and District Rules 1070; 2520, 9.4.2; 4305, 6.1; and 4306, 6.1] Federally Enforceable Through Title V Permit
25. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1; 4306, 6.1 and Rule 4320, 6.1] Federally Enforceable Through Title V Permit
26. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320, 5.1 and 5.3] Federally Enforceable Through Title V Permit
27. All equipment, facilities, or systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
28. The Regional Administrator shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in the conditions below. In addition, the Regional Administrator shall be notified in writing within 15 days of any such failure. [PSD SJ 89-01] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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29. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed under the conditions below, and the methods utilized to restore normal operations. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
30. Facility shall operate this unit in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, State and local air quality regulations. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
31. This unit shall be equipped with oxygen controls, low NOx burner, and a flue gas recirculation system for the control of NOx emissions. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
32. Facility shall conduct annual performance tests for NOx and PM10 and furnish the EPA a written report of the results of such tests. The tests shall be conducted at the maximum operating capacity of the unit. Upon written request from the operator, EPA may approve the conducting of performance tests at a lower specified operating capacity. Upon written request and adequate justification, EPA may waive annual testing requirements for this unit. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
33. Performance tests for NOx and PM10 shall be conducted and the results reported in accordance with the test methods in 40 CFR 60, Part 60.8 and Appendix A. The following test methods shall be used: NOx - EPA methods 1 through 4 (lb/hr), and 7E (ppmv), PM10 - EPA Methods 1 through 5. Equivalent test methods may be used with prior written approval from the EPA. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
34. EPA shall be notified in writing at least 30 days prior to performance tests. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
35. For performance test purposes, sampling ports, platforms, and access shall be provided by the operator at each exhaust system in accordance with 40 CFR 60.8(e). [PSD SJ 89-01] Federally Enforceable Through Title V Permit
36. Operations during periods of startup, shutdown and malfunction shall not constitute representative conditions for the purpose of a performance test. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
37. Only natural gas or a combination of natural gas and field or casing head gas may be fired by this unit. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
38. Field or casing head gas will be sweetened as required to limit the sulfur content of the fuel to 75 gr/scf. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
39. Operator shall record hours of operation and amounts and types of fuel fired each calendar quarter. All information shall be recorded in a form suitable for inspection. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
40. Emission rates shall not exceed any of the following: PM10: 0.303 lb/hr, NOx: 2.71 lb/hr or 35 ppmv dry, @ 3% O2. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
41. Visible emissions shall not exceed « Ringelmann or 10% opacity. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
42. Any relaxation in the District's Determination of Compliance conditions, Authority to Construct conditions, Permit to Operate conditions, or any other subsequent permit of legally binding document that could result in an increase of the potential to emit of any pollutant from this source above the PSD applicability thresholds will require a full PSD review of the source as if construction had not yet begun. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
43. Facility shall have legal and operational responsibility and control of all air pollutant emitting activities of the MOCO TEOR project. This responsibility shall include, but not limited to: operating and maintaining the project to comply with all federal, state and local air pollution laws, regulations, permits, orders and other requirements; ensuring the emissions offsets or other reductions required for this project under permits issued by the District are obtained as required; any violation of any air pollution requirements are the legal responsibility of the facility in addition to any other legally responsible parties. Any proposed change to this condition shall require the prior written concurrence of the EPA. [PSD SJ 89-01] Federally Enforceable Through Title V Permit

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

44. Facility is required to implement the conditions required by the U.S. Fish and Wildlife Service, as outlined in their Biological Opinion and Formal Consultation Response (August 30, 1990), to prevent the incidental taking (killing, harming or harassment) of endangered species that may be affected by this unit. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
45. All correspondence as required by this permit shall be forwarded to: a) Director, Air Management Division, Compliance Section (Attn: A-3-3), EPA Region IX, 75 Hawthorne Street, San Francisco, CA, 94105; b) Chief, Stationary Source Control Division, California Air Resource Board, P.O. Box 2815, Sacramento, CA, 95814; and c) Director, SJVUAPCD, 1990 East Gettysburg, Fresno, CA, 93726. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
46. Formerly S-1511-379

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-886-12

EXPIRATION DATE: 05/31/2016

SECTION: SE35 TOWNSHIP: 12N RANGE: 24W

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS (AND VAPOR RECOVERY GAS) FIRED STEAM GENERATOR WITH A COEN ULN BURNER AND FLUE GAS RECIRCULATION (MOCO #801) (SOUTH MIDWAY)

PERMIT UNIT REQUIREMENTS

1. Copies of all fuel invoices showing quantity and delivery points of supplier-certified gas delivered and copies of quality terms of supplier-certified 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
2. 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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
3. 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 Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D3246 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rules 2520, 9.4.2; 4305, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
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 Rules 2520, 9.4.2; 4305, 6.2; and 4306, 6.2] 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. Steam generator shall be equipped with operational fuel gas volumetric flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Steam generator shall be equipped with operational vapor recovery gas volumetric flow meter whenever unit is connected to the vapor recovery gas supply. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

9. Unit may be disconnected (or reconnected) at the vapor recovery gas supply and the vapor recovery gas volumetric flow meter removed (or replaced). Permittee shall keep a written record of the date(s) when the unit is disconnected (or reconnected) at the vapor recovery gas supply and the vapor recovery gas volumetric flow meter is removed (or replaced). [District Rule 1080] Federally Enforceable Through Title V Permit
10. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following limits: PM10: 0.005 lb/MMBtu, SOx (as SO2): 0.002 lb/MMBtu, VOC: 0.003 lb/MMBtu, NOx (as NO2): 0.018 lb/MMBtu or 15 ppmv @ 3% O2, or CO: 50 ppmv @ 3% O2. [District Rule 2201 and District Rules 2520, 9.1; 4201, 4301, 5.2; 4305, 5.1; and 4306, 5.1] Federally Enforceable Through Title V Permit
11. Emission rates during 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, and 4801] Federally Enforceable Through Title V Permit
12. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Duration of startup and shutdown (as defined in Rule 4306) 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, 5.5 and 4306, 5.3] Federally Enforceable Through Title V Permit
14. 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. Measurement shall be made with the FGR system in the mode of operation (closed or open) in which it was used in the preceding 30 days. 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, and 4306, 5.4] Federally Enforceable Through Title V Permit
15. If the NOX and/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, 5.4, and 4306, 5.4] Federally Enforceable Through Title V Permit
16. 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, and 4306, 5.4.2] Federally Enforceable Through Title V Permit
17. During the 36-month source testing interval the operator shall tune the unit at least twice per calendar year, (from four to eight months apart) by a qualified technician in accordance with the procedure described in Rule 4304, and shall monitor, on a monthly basis, the unit's operational characteristics recommended by the manufacturer. Semi-annual tuning is not required if emissions are monitored monthly with a portable analyzer. [District Rule 4306, 6.3] Federally Enforceable Through Title V Permit

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

18. All emissions measurements for NOx and CO shall be made with the unit operating either at conditions representative of normal operations or conditions 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 4306. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
19. 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 and 4306, 6.3] Federally Enforceable Through Title V Permit
20. 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
21. 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, 6.1; 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
22. 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, and 4306, 5.5.5] Federally Enforceable Through Title V Permit
23. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 2201 and District Rules 1070; 2520; 4305, 6.1; and 4306, 6.1] Federally Enforceable Through Title V Permit
24. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1; 4306, 6.1 and Rule 4320, 6.1] Federally Enforceable Through Title V Permit
25. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320, 5.1 and 5.3] Federally Enforceable Through Title V Permit
26. All equipment, facilities, or systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
27. The Regional Administrator shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in the conditions below. In addition, the Regional Administrator shall be notified in writing within 15 days of any such failure. [PSD SJ 89-01] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

28. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed under the conditions below, and the methods utilized to restore normal operations. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
29. Facility shall operate this unit in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, State and local air quality regulations. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
30. This unit shall be equipped with oxygen controls, low NOx burner, and a flue gas recirculation system for the control of NOx emissions. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
31. Facility shall conduct annual performance tests for NOx and PM10 and furnish the EPA a written report of the results of such tests. The tests shall be conducted at the maximum operating capacity of the unit. Upon written request from the operator, EPA may approve the conducting of performance tests at a lower specified operating capacity. Upon written request and adequate justification, EPA may waive annual testing requirements for this unit. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
32. Performance tests for NOx and PM10 shall be conducted and the results reported in accordance with the test methods in 40 CFR 60, Part 60.8 and Appendix A. The following test methods shall be used: NOx - EPA methods 1 through 4 (lb/hr), and 7E (ppmv), PM10 - EPA Methods 1 through 5. Equivalent test methods may be used with prior written approval from the EPA. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
33. EPA shall be notified in writing at least 30 days prior to performance tests. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
34. For performance test purposes, sampling ports, platforms, and access shall be provided by the operator at each exhaust system in accordance with 40 CFR 60.8(e). [PSD SJ 89-01] Federally Enforceable Through Title V Permit
35. Operations during periods of startup, shutdown and malfunction shall not constitute representative conditions for the purpose of a performance test. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
36. Only natural gas or a combination of natural gas and field or casing head gas may be fired by this unit. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
37. Field or casing head gas will be sweetened as required to limit the sulfur content of the fuel to 75 gr/scf. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
38. Operator shall record hours of operation and amounts and types of fuel fired each calendar quarter. All information shall be recorded in a form suitable for inspection. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
39. Emission rates shall not exceed any of the following: PM10: 0.303 lb/hr, NOx: 2.71 lb/hr or 35 ppmv dry, @ 3% O2. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
40. Visible emissions shall not exceed « Ringelmann or 10% opacity. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
41. Any relaxation in the District's Determination of Compliance conditions, Authority to Construct conditions, Permit to Operate conditions, or any other subsequent permit of legally binding document that could result in an increase of the potential to emit of any pollutant from this source above the PSD applicability thresholds will require a full PSD review of the source as if construction had not yet begun. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
42. Facility shall have legal and operational responsibility and control of all air pollutant emitting activities of the MOCO TEOR project. This responsibility shall include, but not limited to: operating and maintaining the project to comply with all federal, state and local air pollution laws, regulations, permits, orders and other requirements; ensuring the emissions offsets or other reductions required for this project under permits issued by the District are obtained as required; any violation of any air pollution requirements are the legal responsibility of the facility in addition to any other legally responsible parties. Any proposed change to this condition shall require the prior written concurrence of the EPA. [PSD SJ 89-01] Federally Enforceable Through Title V Permit

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

43. Facility is required to implement the conditions required by the U.S. Fish and Wildlife Service, as outlined in their Biological Opinion and Formal Consultation Response (August 30, 1990), to prevent the incidental taking (killing, harming or harassment) of endangered species that may be affected by this unit. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
44. All correspondence as required by this permit shall be forwarded to: a) Director, Air Management Division, Compliance Section (Attn: A-3-3), EPA Region IX, 75 Hawthorne Street, San Francisco, CA, 94105; b) Chief, Stationary Source Control Division, California Air Resource Board, P.O. Box 2815, Sacramento, CA, 95814; and c) Director, SJVUAPCD, 1990 East Gettysburg, Fresno, CA, 93726. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
45. Formerly S-1511-380

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1547-1030-10

EXPIRATION DATE: 05/31/2016

SECTION: SE35 TOWNSHIP: 12N RANGE: 24W

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) (MOCO #805) (SOUTH MIDWAY)

PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. 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 Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 4468, D 4084, D3246 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2; 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
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, 9.4.2; 4305, 6.2; and 4306, 6.2] 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. Steam generator shall be equipped with operational natural gas volumetric flow meters. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Natural gas fuel sulfur content shall not exceed 0.75 gr S/100 scf. [District Rule 2201; PSD SJ 89-01] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

9. 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): 0.018 lb/MMBtu or 15 ppmv @ 3% O2, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O2. [District Rules 2201, 4305, 5.1, and 4306, 5.1] Federally Enforceable Through Title V Permit
10. 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 4301, 5.2; 4405, 5.2; 4406, 4.2 and 4801, 3.1] Federally Enforceable Through Title V Permit
11. 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: 4.5 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
12. Duration of startup and shutdown (as defined in Rule 4306) 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, 5.5 and 4306, 5.3] Federally Enforceable Through Title V Permit
13. 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
14. 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 the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
15. 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, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
16. 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 and 4306, 5.4] Federally Enforceable Through Title V Permit

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

17. 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. 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 4306. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
18. 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 and 4306, 6.3] Federally Enforceable Through Title V Permit
19. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
20. 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, 7.1] Federally Enforceable Through Title V Permit
21. 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, 6.1; 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
22. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
23. 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, 4.0; 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
24. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1; 4306, 6.1 and Rule 4320, 6.1] Federally Enforceable Through Title V Permit
25. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320, 5.1 and 5.3] Federally Enforceable Through Title V Permit
26. All equipment, facilities, or systems installed or used to achieve compliance with the terms and conditions of this permit shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
27. The Regional Administrator shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in the conditions below. In addition, the Regional Administrator shall be notified in writing within 15 days of any such failure. [PSD SJ 89-01] Federally Enforceable Through Title V Permit

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

28. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed under the conditions below, and the methods utilized to restore normal operations. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
29. Facility shall operate this unit in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, State and local air quality regulations. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
30. This unit shall be equipped with oxygen controls, low NOx burner, and a flue gas recirculation system for the control of NOx emissions. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
31. Facility shall conduct annual performance tests for NOx and PM10 and furnish the EPA a written report of the results of such tests. The tests shall be conducted at the maximum operating capacity of the unit. Upon written request from the operator, EPA may approve the conducting of performance tests at a lower specified operating capacity. Upon written request and adequate justification, EPA may waive annual testing requirements for this unit. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
32. Performance tests for NOx and PM10 shall be conducted and the results reported in accordance with the test methods in 40 CFR 60, Part 60.8 and Appendix A. The following test methods shall be used: NOx - EPA methods 1 through 4 (lb/hr) and 7E (ppmv), PM10 - EPA Methods 1 through 5. Equivalent test methods may be used with prior written approval from the EPA. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
33. EPA shall be notified in writing at least 30 days prior to performance tests. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
34. For performance test purposes, sampling ports, platforms, and access shall be provided by the operator at each exhaust system in accordance with 40 CFR 60.8(e). [PSD SJ 89-01] Federally Enforceable Through Title V Permit
35. Operations during periods of startup, shutdown and malfunction shall not constitute representative conditions for the purpose of a performance test. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
36. Only natural gas or a combination of natural gas and field or casing head gas may be fired by this unit. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
37. Operator shall record hours of operation and amounts and types of fuel fired each calendar quarter. All information shall be recorded in a form suitable for inspection. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
38. Emission rates shall not exceed any of the following: PM10: 0.303 lb/hr, NOx: 2.71 lb/hr or 35 ppmv dry, @ 3% O2. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
39. Visible emissions shall not exceed « Ringelmann or 10% opacity. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
40. Any relaxation in the District's Determination of Compliance conditions, Authority to Construct conditions, Permit to Operate conditions, or any other subsequent permit of legally binding document that could result in an increase of the potential to emit of any pollutant from this source above the PSD applicability thresholds will require a full PSD review of the source as if construction had not yet begun. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
41. Facility shall have legal and operational responsibility and control of all air pollutant emitting activities of the MOCO TEOR project. This responsibility shall include, but not limited to: operating and maintaining the project to comply with all federal, state and local air pollution laws, regulations, permits, orders and other requirements; ensuring the emissions offsets or other reductions required for this project under permits issued by the District are obtained as required; any violation of any air pollution requirements are the legal responsibility of the facility in addition to any other legally responsible parties. Any proposed change to this condition shall require the prior written concurrence of the EPA. [PSD SJ 89-01] Federally Enforceable Through Title V Permit

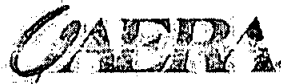
PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

42. Facility is required to implement the conditions required by the U.S. Fish and Wildlife Service, as outlined in their Biological Opinion and Formal Consultation Response (August 30, 1990), to prevent the incidental taking (killing, harming or harassment) of endangered species that may be affected by this unit. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
43. All correspondence as required by this permit shall be forwarded to: a) Director, Air Management Division, Compliance Section (Attn: A-3-3), EPA Region IX, 75 Hawthorne Street, San Francisco, CA, 94105; b) Chief, Stationary Source Control Division, California Air Resource Board, P.O. Box 2815, Sacramento, CA, 95814; and c) Director, SJVUAPCD, 1990 East Gettysburg, Fresno, CA, 93726. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
44. NOTE: Formerly S-1511-378

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

Aera Energy, LLC
S1547, 1140535

ATTACHMENT II
Aera Letter to EPA



COPY

April 17, 2006

Ms. Deborah Jordan
Director, Air Division
U.S. EPA Region 9
75 Hawthorne Street
San Francisco, CA, 94105

SUBJECT: REQUEST TO WAIVE
PM10 SOURCE TESTING REQUIREMENTS FOR
FOURTEEN STEAM GENERATORS
EPA PERMIT NUMBERS NSR 4-4-8, SJ 89-01, SJ 89-02

Dear Ms. Jordan;

Aera Energy LLC (Aera) operates fourteen natural gas fired steam generators constructed under the authority of PSD permits SJ 89-01 and SJ 89-02 at our MOCO and Alberta-Shale oil production facilities. These permits require annual performance tests for NOx and PM10. The purpose of this correspondence is to request that the EPA waive the annual PM10 performance testing requirement for these steam generators.

The PM10 tests consistently show that the steam generators emit significantly less PM10 than the permit limit. Aera has performed 44 PM10 source tests on these fourteen steam generators during the last three years. The highest test result was still less than half the permit limit and most of the results were significantly lower than that. Attached is a table showing the results of the PM10 testing for each of these steam generators during the last three years. Also attached is a chart showing the same data compared to the permit limit. These demonstrate that the steam generators consistently meet their permit limit.

The steam generators burn natural gas as fuel and have no additional emission controls for PM10. Therefore, the annual testing is not necessary to confirm effective operation of an emission control device. These tests are expensive to perform without providing any benefit. It is costing Aera approximately \$29,000 per year to comply with the annual EPA PM10 testing requirement in addition to the administrative time required to schedule, supervise, and report on the results of the testing.

The PSD permits allow EPA to waive the annual PM10 testing requirement. The permits state that after the initial performance tests and upon justification, EPA may waive annual testing requirements for the steam generators. Aera requests that EPA exercise this option and waive the annual PM10 testing requirement for these steam generators.

We look forward to your reply. If you have any questions or if you would like to discuss this matter further, please contact me at (661) 665-5689 or by email at pashue@aeraenergy.com. Thank you for your consideration.

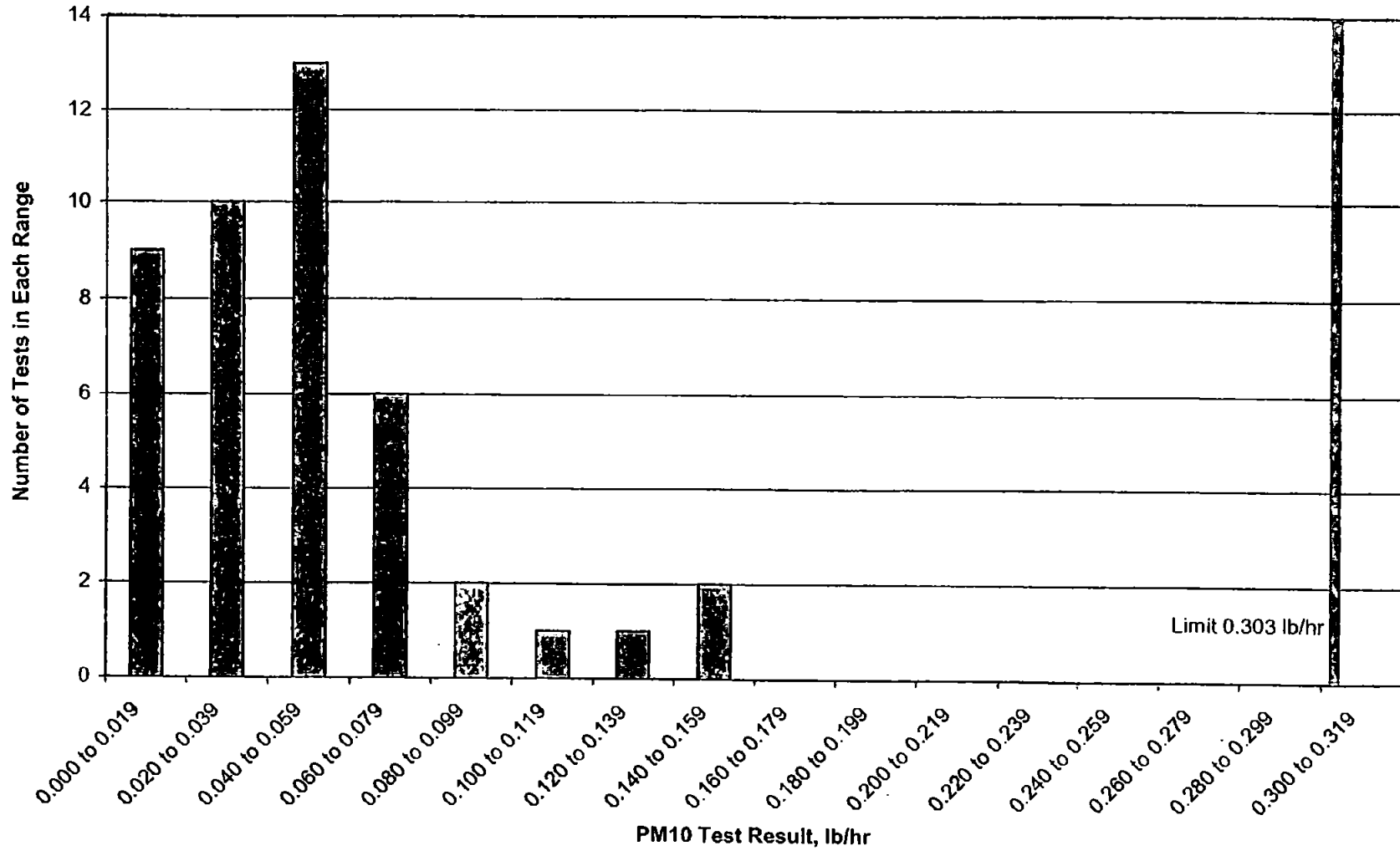
Sincerely,

A handwritten signature in black ink that reads "Peggy Shue". The signature is written in a cursive style with a long horizontal flourish at the end.

Peggy Shue
Lead EHS Advisor, Air

cc: Scott Guidry
Steve Nixon

Aera Energy PM10 Source Test Results 2003-2005
Permits SJ 89-01 and 89-02



AERA ENERGY LLC EPA PM10 SOURCE TEST RESULTS

SJVAPCD PTO	EPA PSD NSR4-4-8	Field	Lease	Unit ID #	PM10 Limit LB/hr	PM10 Test Date	PM10 Test Results	PM10 Test Date	PM10 Test Results	PM10 Test Date	PM10 Test Results
S-1547-780	SJ 89 - 01	SMWSS	Moco	704	0.303	10/26/05	0.043				
S-1547-781	SJ 89 - 01	SMWSS	Moco	705	0.303	10/25/05	0.052				
S-1547-780	SJ 89 - 01	SMWSS	Moco	704	0.303	04/13/05	0.094	04/14/04	0.145	04/16/03	0.033
S-1547-781	SJ 89 - 01	SMWSS	Moco	705	0.303	04/12/05	0.041	04/15/04	0.047	04/17/03	0.037
S-1547-886	SJ 89 - 01	SMWSS	Moco	801	0.303	01/13/05	0.130	04/20/04	0.026	04/22/03	0.074
S-1547-885	SJ 89 - 01	SMWSS	Moco	803	0.303	04/19/05	0.041	04/21/04	0.021	04/23/03	0.056
S-1547-1030	SJ 89 - 01	SMWSS	Moco	805	0.303	04/20/05	0.031	04/21/04	0.002	04/23/03	0.053
S-1547-812	SJ 89 - 01	SMWSS	Moco	807	0.303	04/21/05	0.074	04/22/04	0.008	04/24/03	0.072
S-1547-811	SJ 89 - 01	SMWSS	Moco	808	0.303	04/27/05	0.025	04/29/04	0.119	04/29/03	0.030
S-1547-831	SJ 89 - 01	SMWSS	Moco	809	0.303	04/21/05	0.098	04/22/04	0.005	04/24/03	0.047
S-1547-805	SJ 89 - 02	NMWSS	Finley	9	0.303	03/08/05	0.048	03/17/04	0.015	03/19/03	0.040
S-1547-806	SJ 89 - 02	NMWSS	Finley	10	0.303	01/25/05	0.146	03/16/04	0.018	03/18/03	0.072
S-1547-827	SJ 89 - 02	NMWSS	Finley	11	0.303	02/24/05	0.017	03/24/04	0.033	03/25/03	0.026
S-1547-828	SJ 89 - 02	NMWSS	Finley	12	0.303	03/09/05	0.040	03/17/04	0.012	03/19/03	0.049
S-1547-829	SJ 89 - 02	NMWSS	Finley	13	0.303	03/09/05	0.060	03/18/04	0.003	03/20/03	0.039
S-1547-801	SJ 89 - 02	NMWSS	Shale	6	0.303	03/10/05	0.068	03/25/04	0.007	03/26/03	0.040

ATTACHMENT III
Compliance Certification Form

San Joaquin Valley
Unified Air Pollution Control District

TITLE V COMPLIANCE CERTIFICATION FORM

RECEIVED
FEB 13 2014
SJVAPCD
Southern Region

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE AMENDMENT
 MINOR PERMIT MODIFICATION

COMPANY NAME: Aera Energy LLC	FACILITY ID: S-1547
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Aera Energy LLC	
3. Agent to the Owner: N/A	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial each circle for confirmation):

- Based on information and belief formed after reasonable inquiry, the emission units identified in this application will continue to comply with the applicable federal requirement(s) which the emission units are in compliance.
- Based on information and belief formed after reasonable inquiry, the emission units identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

E.E. Patterson
Signature of Responsible Official

2-12-14
Date

E.E. Patterson
Name of Responsible Official (please print)

Process Supervisor
Title of Responsible Official (please print)

ATTACHMENT IV
Draft ATCs

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT
ISSUANCE DATE: DRAFT

PERMIT NO: S-1547-780-20

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: NW35 TOWNSHIP: 12N RANGE: 24W

EQUIPMENT DESCRIPTION:

MODIFICATION TO 62.5MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLNU-LN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819, (MOCO #704) (SOUTH MIDWAY) : DELETE/REVISE PSD CONDITIONS

CONDITIONS

1. {1830} 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. {1831} 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. {520} 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 MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

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Arnaud Marjolle, Director of Permit Services

S-1547-780-20 Jun 11 2014 2:20PM - EDGEHILR - Joint Inspection NOT Required

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 Rules 2520, 9.4.2 and 4320] 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, 4306, 4320, 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: fire the unit only on PUC or FERC regulated natural gas, 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. {565} 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 equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District Rule 2201; PSD SJ 89-01] Federally Enforceable Through Title V Permit
11. When combusting a combination of natural gas and vapor recovery gas, the fuel gas sulfur content shall not exceed 5 grains of total sulfur (as H₂S) per 100 dscf of fuel gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
12. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Total TEOR gas from permit S-1547-819 incinerated in steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 4.09 MMscf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Permittee shall maintain accurate daily records of gas flowrate delivered to steam generators S-1547-766 to '-772, '-777 to '-781, and '-797. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Total PM₁₀ emissions for steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 129.1 lb/day nor 47,122 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: PM₁₀: 0.005 lb/MMBTU or SO_x (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
18. Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following: VOC: 0.003 lb/MMBTU, NO_x (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, 2520, 4301, 4305, 4306, 4320, 4405 and Kern County Rule 425] Federally Enforceable Through Title V Permit
19. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NO_x (as NO₂): 49.0 lb/day or 9,461 lb/year, or CO: 43.2 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

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
21. 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
22. The permittee shall monitor and record the stack concentration of NO_x, 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, 4306, and 4320] Federally Enforceable Through Title V Permit
23. If either the NO_x 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 the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. 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
25. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 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, 4306, and 4320] Federally Enforceable Through Title V Permit
26. 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
27. Source testing to measure natural gas-combustion NO_x 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

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CONDITIONS CONTINUE ON NEXT PAGE

28. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- ~~29. 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~~
30. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (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, SO_x (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
31. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
32. Operator shall provide an annual fuel sulfur content analysis to the District upon request. [District Rule 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, 4306, and 4320] Federally Enforceable Through Title V Permit
34. Facility shall operate this unit in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, State and local air quality regulations. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
35. Visible emissions shall not exceed 10% opacity. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
36. Any relaxation in the District's Determination of Compliance conditions, Authority to Construct conditions, Permit to Operate conditions, or any other subsequent permit of legally binding document that could result in an increase of the potential to emit of any pollutant from this source above the PSD applicability thresholds will require a full PSD review of the source as if construction had not yet begun. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
37. Facility shall have legal and operational responsibility and control of all air pollutant emitting activities of the MOCO TEOR project. This responsibility shall include, but not limited to: operating and maintaining the project to comply with all federal, state and local air pollution laws, regulations, permits, orders and other requirements; ensuring the emissions offsets or other reductions required for this project under permits issued by the District are obtained as required; any violation of any air pollution requirements are the legal responsibility of the facility in addition to any other legally responsible parties. Any proposed change to this condition shall require the prior written concurrence of the EPA. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
38. Facility is required to implement the conditions required by the U.S. Fish and Wildlife Service, as outlined in their Biological Opinion and Formal Consultation Response (August 30, 1990), to prevent the incidental taking (killing, harming or harassment) of endangered species that may be affected by this unit. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
39. Note: Formerly S-1511-137
40. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NO_x emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NO_x emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
41. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years; and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1547-781-20

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: NW35 TOWNSHIP: 12N RANGE: 24W

EQUIPMENT DESCRIPTION:

MODIFICATION TO 62.5 MMBTU/HR NATURAL GAS/VAPOR RECOVERY GAS FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) AND PIPING FROM TEOR WELL VENT VAPOR RECOVERY SYSTEM S-1547-819, (MOCO #705) (SOUTH MIDWAY): DELETE/REVISE PSD CONDITIONS

CONDITIONS

1. {1830} 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. {1831} 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. {520} 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 **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

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Arnaud Marjollet, Director of Permit Services
S-1547-781-20 - Jun 11 2014 2:20PM - EDGEHILR - Joint Inspection NOT Required

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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 Rules 2520, 9.4.2 and 4320] 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, 4306, 4320, 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: fire the unit only on PUC or FERC regulated natural gas, 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. {565} 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 equipped with operational fuel gas and vapor recovery gas volumetric flow meters. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Only natural gas or a combination of natural gas and TEOR well vent vapors from well vent vapor control system S-1547-819 shall be used as fuel in this steam generator. [District Rule 2201; PSD SJ 89-01] Federally Enforceable Through Title V Permit
11. When combusting a combination of natural gas and vapor recovery gas, the fuel gas sulfur content shall not exceed 5 grains of total sulfur (as H₂S) per 100 scf of fuel gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
12. Maximum heat input to steam generator shall not exceed 1,440 MMBTU/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Total TEOR gas from permit S-1547-819 incinerated in steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 4.09 MMscf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Permittee shall maintain accurate daily records of gas flowrate delivered to steam generators S-1547-766 to '-772, '-777 to '-781, and '-797. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Total PM₁₀ emissions for steam generators S-1547-766 to '-772, '-777 to '-781, and '-797 shall not exceed 129.1 lb/day nor 47,122 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Emission rates, except during startup, shutdown, and refractory curing from the combustion of natural gas, shall not exceed any of the following: PM₁₀: 0.005 lb/MMBTU or SO_x (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
18. Emission rates shall not exceed any of the following: VOC: 4.3 lb/day, NO_x (as NO₂): 49.0 lb/day or 9,461 lb/year, or CO: 43.2 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
19. Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following: VOC: 0.003 lb/MMBTU, NO_x (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, 2520, 4301, 4305, 4306, 4320, 4405 and Kern County Rule 425] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

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, 4320, 4801 and Kern County Rules 424 and 425] Federally Enforceable Through Title V Permit
21. 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
22. The permittee shall monitor and record the stack concentration of NO_x, 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, 4306, and 4320] Federally Enforceable Through Title V Permit
23. If either the NO_x 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 the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. 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
25. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 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, 4306, and 4320] Federally Enforceable Through Title V Permit
26. 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
27. Source testing to measure natural gas-combustion NO_x 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

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28. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
29. 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
30. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (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, SO_x (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
31. 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, 4306, and 4320] Federally Enforceable Through Title V Permit
32. Operator shall provide an annual fuel sulfur content analysis to the District upon request. [District Rule 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, 4306, and 4320] Federally Enforceable Through Title V Permit
34. Facility shall operate this unit in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, State and local air quality regulations. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
35. Visible emissions shall not exceed 10% opacity. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
36. Any relaxation in the District's Determination of Compliance conditions, Authority to Construct conditions, Permit to Operate conditions, or any other subsequent permit of legally binding document that could result in an increase of the potential to emit of any pollutant from this source above the PSD applicability thresholds will require a full PSD review of the source as if construction had not yet begun. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
37. Facility shall have legal and operational responsibility and control of all air pollutant emitting activities of the MOCO TEOR project. This responsibility shall include, but not limited to: operating and maintaining the project to comply with all federal, state and local air pollution laws, regulations, permits, orders and other requirements; ensuring the emissions offsets or other reductions required for this project under permits issued by the District are obtained as required; any violation of any air pollution requirements are the legal responsibility of the facility in addition to any other legally responsible parties. Any proposed change to this condition shall require the prior written concurrence of the EPA. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
38. Facility is required to implement the conditions required by the U.S. Fish and Wildlife Service, as outlined in their Biological Opinion and Formal Consultation Response (August 30, 1990), to prevent the incidental taking (killing, harming or harassment) of endangered species that may be affected by this unit. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
39. Note: Formerly S-1511-138
40. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NO_x emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NO_x emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
41. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1547-801-17

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: SE14 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

MODIFICATION TO 62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH COEN QLN-ULN BURNER AND FLUE GAS RECIRCULATION (SHALE #6, NORTH MIDWAY): DELETE/REVISE PSD CONDITIONS

CONDITIONS

1. {1830} 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. {1831} 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. 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 **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

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Arnaud Marjollet, Director of Permit Services
S-1547-801-17 : Jun 11 2014, 2:20PM - EDGEHILR : Joint Inspection NOT Required

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5. 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 Rule 2520, 9.3.2] 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, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 4468, D 4084, D3246 or grab sample analysis by double GC for H₂S and mercaptans performed in the laboratory. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
7. 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 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
8. {565} 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. Only natural gas shall be used as fuel in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Annual heat input to steam generator shall not exceed 525.6 billion Btu hhv. [District Rule 2201] Federally Enforceable Through Title V Permit
11. 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
12. 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): 0.018 lb/MMBtu or 15 ppmv @ 3% O₂, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O₂. [District Rules 2201; 4305, 5.1 and 4306, 5.1] Federally Enforceable Through Title V Permit
13. 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 4301, 5.2; 4405, 5.2; 4406, 4.2 and 4801, 3.1] Federally Enforceable Through Title V Permit
14. Steam generator shall be equipped with operational fuel gas volumetric flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Emission rates shall not exceed any of the following: VOC: 7.5 lb/day, NOx (as NO₂): 51.0 lb/day or 9461 lb/year, or CO: 45.0 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
16. Duration of startup and shutdown (as defined in Rule 4306) 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, 5.5 and 4306, 5.3] 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, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

18. If the NO_x 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 the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] 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, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
20. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 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 and 4306, 5.4] 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. 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 4306. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
22. Source testing to measure natural gas-combustion NO_x 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 and 4306, 6.3] Federally Enforceable Through Title V Permit
23. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
24. 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
25. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (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, SO_x (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, 6.1; 4305, 6.2 and 4305, 6.2] Federally Enforceable Through Title V Permit
26. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

27. 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, 4.0; 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
- ~~28. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1; 4306, 6.1 and Rule 4320, 6.1] Federally Enforceable Through Title V Permit~~
29. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320, 5.1 and 5.3] Federally Enforceable Through Title V Permit
30. Formerly S-1511-171
31. Facility shall operate this unit in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, State and local air quality regulations. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
32. Visible emissions shall not exceed 10% opacity. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
33. Any relaxation in the District's Determination of Compliance conditions, Authority to Construct conditions, Permit to Operate conditions, or any other subsequent permit of legally binding document that could result in an increase of the potential to emit of any pollutant from this source above the PSD applicability thresholds will require a full PSD review of the source as if construction had not yet begun. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
34. Facility shall have legal and operational responsibility and control of all air pollutant emitting activities of the MOCO TEOR project. This responsibility shall include, but not limited to: operating and maintaining the project to comply with all federal, state and local air pollution laws, regulations, permits, orders and other requirements; ensuring the emissions offsets or other reductions required for this project under permits issued by the District are obtained as required; any violation of any air pollution requirements are the legal responsibility of the facility in addition to any other legally responsible parties. Any proposed change to this condition shall require the prior written concurrence of the EPA. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
35. Facility is required to implement the conditions required by the U.S. Fish and Wildlife Service, as outlined in their Biological Opinion and Formal Consultation Response (August 30, 1990), to prevent the incidental taking (killing, harming or harassment) of endangered species that may be affected by this unit. [PSD SJ 89-02] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1547-805-19

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: SE14 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

MODIFICATION TO 62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH COEN QLN-ULN LOW NOX BURNER AND FLUE GAS RECIRCULATION (FINLEY #9, NORTH MIDWAY): DELETE/REVISE PSD CONDITIONS

ISSUANCE DATE: DRAFT
DRAFT

CONDITIONS

1. {1830} 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. {1831} 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 supplier-certified gas delivered and copies of quality terms of supplier-certified 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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 MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

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Arnaud Marjolle, Director of Permit Services
S-1547-805-19 : Jun 11 2014 2:20PM - EDGEHLR : Joint Inspection NOT Required

5. When complying with SO_x 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 Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. If the unit is fired on noncertified gaseous fuel and compliance with SO_x emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D3246 or grab sample analysis by double GC for H₂S and mercaptans performed in the laboratory. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
7. 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 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
8. {565} 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 equipped with operational fuel gas volumetric flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Only natural gas shall be used as fuel in this steam generator. [District Rule 2201; PSD SJ 89-02] Federally Enforceable Through Title V Permit
11. Annual heat input to steam generator shall not exceed 525.6 billion BTU hhv. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following: PM₁₀: 0.005 lb/MMBtu, SO_x (as SO₂): 0.002 lb/MMBtu, VOC: 0.003 lb/MMBtu, NO_x (as NO₂): 0.018 lb/MMBtu or 15 ppmv @ 3% O₂, or CO: 50 ppmv @ 3% O₂. [District Rules 2201; 4305, 5.1 and 4306, 5.1] Federally Enforceable Through Title V Permit
13. Emission rates during 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 4201, 3.0; 4301, 5.2; 4405, 5.2; 4406, 4.2 and 4801, 3.1] Federally Enforceable Through Title V Permit
14. 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
15. Duration of startup and shutdown (as defined in Rule 4306) 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, 5.5 and 4306, 5.3] Federally Enforceable Through Title V Permit
16. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every 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 and 4306, 5.4] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

17. If either the NO_x 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 the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
18. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 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 and 4306, 5.4] 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, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
20. All emissions measurements for NO_x and CO shall be made with the unit operating either at conditions representative of normal operations or conditions 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 4306. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
21. Source testing to measure natural gas-combustion NO_x 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 and 4306, 6.3] Federally Enforceable Through Title V Permit
22. 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
23. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
24. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (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, SO_x (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, 6.1; 4305, 6.2 and 4305, 6.2] Federally Enforceable Through Title V Permit
25. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

26. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit.
27. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1; 4306, 6.1 and Rule 4320, 6.1] Federally Enforceable Through Title V Permit
28. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320, 5.1 and 5.3] Federally Enforceable Through Title V Permit
29. Facility shall operate this unit in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, State and local air quality regulations. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
30. Visible emissions shall not exceed 10% opacity. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
31. Any relaxation in the District's Determination of Compliance conditions, Authority to Construct conditions, Permit to Operate conditions, or any other subsequent permit of legally binding document that could result in an increase of the potential to emit of any pollutant from this source above the PSD applicability thresholds will require a full PSD review of the source as if construction had not yet begun. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
32. Facility shall have legal and operational responsibility and control of all air pollutant emitting activities of the MOCO TEOR project. This responsibility shall include, but not limited to: operating and maintaining the project to comply with all federal, state and local air pollution laws, regulations, permits, orders and other requirements; ensuring the emissions offsets or other reductions required for this project under permits issued by the District are obtained as required; any violation of any air pollution requirements are the legal responsibility of the facility in addition to any other legally responsible parties. Any proposed change to this condition shall require the prior written concurrence of the EPA. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
33. Facility is required to implement the conditions required by the U.S. Fish and Wildlife Service, as outlined in their Biological Opinion and Formal Consultation Response (August 30, 1990), to prevent the incidental taking (killing, harming or harassment) of endangered species that may be affected by this unit. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
34. Formerly S-1511-186

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT
ISSUANCE DATE: DRAFT

PERMIT NO: S-1547-806-19

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: SE14 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:
MODIFICATION TO 62.5 MMBTU/HR NATURAL GAS FIRED STEAM GENERATOR WITH COEN ULN LOW NOX
BURNER AND FLUE GAS RECIRCULATION (FINLEY #10, NORTH MIDWAY): DELETE/REVISE PSD CONDITIONS

CONDITIONS

1. {1830} 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. {1831} 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 supplier-certified gas delivered and copies of quality terms of supplier-certified 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. 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 MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

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Arnaud Marjolle, Director of Permit Services
S-1547-806-19 Jun 17 2014 1:45PM - EDQEHLR : Joint Inspection NOT Required

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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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. When complying with SO_x 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 Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
7. If the unit is fired on noncertified gaseous fuel and compliance with SO_x emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D3246 or grab sample analysis by double GC for H₂S and mercaptans performed in the laboratory. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
8. 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 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
9. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), 4301 (Amended December 17, 1992), 4406 (Amended December 17, 1992, and Rule 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
10. {565} 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
11. Steam generator shall be equipped with an operational fuel gas volumetric flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Only natural gas shall be used as fuel in this steam generator. [District Rule 2201; PSD SJ 89-02] Federally Enforceable Through Title V Permit
13. Annual heat input to steam generator shall not exceed 525.6 billion BTU hhv. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following: PM₁₀: 0.005 lb/MMBtu, SO_x (as SO₂): 0.002 lb/MMBtu, VOC: 0.003 lb/MMBtu, NO_x (as NO₂): 0.018 lb/MMBtu or 15 ppmv @ 3% O₂, or CO: 50 ppmv @ 3% O₂. [District Rules 2201; 4305, 5.5 and 4306, 5.1] Federally Enforceable Through Title V Permit
15. Emission rates during 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 4201, 3.0; 4301, 5.2; 4405, 5.2; 4406, 4.2 and 4801, 3.1] Federally Enforceable Through Title V Permit
16. Duration of startup and shutdown (as defined in Rule 4306) 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, 5.5 and 4306, 5.3] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

17. The permittee shall monitor and record the stack concentration of NO_x, 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. Measurement shall be made with the FGR system in the mode of operation (closed or open) in which it was used in the preceding 30 days. 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
18. If either the NO_x 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
19. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
20. All emissions measurements for NO_x and CO shall be made with the unit operating either at conditions representative of normal operations or conditions 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 4306. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
21. Source testing to measure natural gas-combustion NO_x 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). After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. 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 Rule 2201 and District Rules 4305, 6.3 and 4306, 6.3] Federally Enforceable Through Title V Permit
22. Whenever the unit is switched to operate with the flue gas recirculation (FGR) system in the closed position, compliance source testing for NO_x 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] Federally Enforceable Through Title V Permit
23. 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
24. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
- 25.²⁵ The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (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, SO_x (lb/MMBtu) - EPA Method 6 or 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D4084 or double GC for H₂S and mercaptans performed in a laboratory, fuel gas hhv - D1326 or D1945 in conjunction with ASTM D3588. [District Rules 1081, 6.1; 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

26. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
27. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
28. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1; 4306, 6.1 and Rule 4320, 6.1] Federally Enforceable Through Title V Permit
29. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320, 5.1 and 5.3] Federally Enforceable Through Title V Permit
30. Formerly S-1511-187
31. Facility shall operate this unit in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, State and local air quality regulations. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
32. Visible emissions shall not exceed 10% opacity. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
33. Any relaxation in the District's Determination of Compliance conditions, Authority to Construct conditions, Permit to Operate conditions, or any other subsequent permit of legally binding document that could result in an increase of the potential to emit of any pollutant from this source above the PSD applicability thresholds will require a full PSD review of the source as if construction had not yet begun. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
34. Facility shall have legal and operational responsibility and control of all air pollutant emitting activities of the MOCO TEOR project. This responsibility shall include, but not limited to: operating and maintaining the project to comply with all federal, state and local air pollution laws, regulations, permits, orders and other requirements; ensuring the emissions offsets or other reductions required for this project under permits issued by the District are obtained as required; any violation of any air pollution requirements are the legal responsibility of the facility in addition to any other legally responsible parties. Any proposed change to this condition shall require the prior written concurrence of the EPA. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
35. Facility is required to implement the conditions required by the U.S. Fish and Wildlife Service, as outlined in their Biological Opinion and Formal Consultation Response (August 30, 1990), to prevent the incidental taking (killing, harming or harassment) of endangered species that may be affected by this unit. [PSD SJ 89-02] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT
ISSUANCE DATE: DRAFT

PERMIT NO: S-1547-812-16

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: SE35 **TOWNSHIP:** 12N **RANGE:** 24W

EQUIPMENT DESCRIPTION:

MODIFICATION TO 62.5 MMBTU/HR NATURAL GAS (AND VAPOR RECOVERY GAS) FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN BURNER AND FLUE GAS RECIRCULATION (MOCO #807) (SOUTH MIDWAY): DELETE/REVISE PSD CONDITIONS

CONDITIONS

1. {1830} 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. {1831} 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. 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 MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

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Arnaud Marjolle, Director of Permit Services
6-1547-812-16 Jun 17 2014 1:45PM - EDGEHILR : Joint Inspection NOT Required

5. 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 Rule 2520, 9.3.2] 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, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 4468, D 4084, D3246 or grab sample analysis by double GC for H₂S and mercaptans performed in the laboratory. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
7. 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 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
8. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements of SJVUAPCD Rules 4201 (Amended December 17, 1992), 4301 (Amended December 17, 1992), 4406 (Amended December 17, 1992, and Rule 4801 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
9. {565} 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
10. Steam generator shall be equipped with operational fuel gas volumetric flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Steam generator shall be equipped with operational vapor recovery gas volumetric flow meter whenever unit is connected to the vapor recovery gas supply. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Unit may be disconnected (or reconnected) at the vapor recovery gas supply and the vapor recovery gas volumetric flow meter removed (or replaced). Permittee shall keep a written record of the date(s) when the unit is disconnected (or reconnected) at the vapor recovery gas supply and the vapor recovery gas volumetric flow meter is removed (or replaced). [District Rule 1080] Federally Enforceable Through Title V Permit
13. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Emission rates, except during startup, shutdown, and refractory curing shall not exceed any of the following limits: PM₁₀: 0.005 lb/MMBtu, SO_x (as SO₂): 0.002 lb/MMBtu, VOC: 0.003 lb/MMBtu, NO_x (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; 4305, 5.1 and 4306, 5.1] Federally Enforceable Through Title V Permit
15. Emission rates shall not exceed any of the following: PM₁₀: 7.5 lb/day, SO_x (as SO₂): 3.0 lb/day, VOC: 4.5 lb/day, NO_x (as NO₂): 51.0 lb/day or 9855 lb/year, or CO: 45.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. 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 4201, 3.0; 4301, 5.2; 4405, 5.2; 4406, 4.2 and 4801, 3.1] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

17. 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, 5.5; 4306, 5.3 and 4320, 5.6] Federally Enforceable Through Title V Permit
18. The permittee shall monitor and record the stack concentration of NO_x, 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
19. If the NO_x 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 the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
20. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
21. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
22. 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. 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 4306. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
23. Source testing to measure natural gas-combustion NO_x 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 and 4306, 6.3] Federally Enforceable Through Title V Permit
24. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

25. 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
26. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (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, SO_x (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 Rules 1081; 4305, 6.2; and 4306, 6.2] Federally Enforceable Through Title V Permit
27. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
28. 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 and 4306, 6.1] Federally Enforceable Through Title V Permit
29. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1; 4306, 6.1 and Rule 4320, 6.1] Federally Enforceable Through Title V Permit
30. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NO_x emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NO_x emission limit listed in Rule 4320. [District Rule 4320, 5.1 and 5.3] Federally Enforceable Through Title V Permit
31. Facility shall operate this unit in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, State and local air quality regulations. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
32. Visible emissions shall not exceed 10% opacity. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
33. Any relaxation in the District's Determination of Compliance conditions, Authority to Construct conditions, Permit to Operate conditions, or any other subsequent permit of legally binding document that could result in an increase of the potential to emit of any pollutant from this source above the PSD applicability thresholds will require a full PSD review of the source as if construction had not yet begun. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
34. Facility shall have legal and operational responsibility and control of all air pollutant emitting activities of the MOCO TEOR project. This responsibility shall include, but not limited to: operating and maintaining the project to comply with all federal, state and local air pollution laws, regulations, permits, orders and other requirements; ensuring the emissions offsets or other reductions required for this project under permits issued by the District are obtained as required; any violation of any air pollution requirements are the legal responsibility of the facility in addition to any other legally responsible parties. Any proposed change to this condition shall require the prior written concurrence of the EPA. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
35. Facility is required to implement the conditions required by the U.S. Fish and Wildlife Service, as outlined in their Biological Opinion and Formal Consultation Response (August 30, 1990), to prevent the incidental taking (killing, harming or harassment) of endangered species that may be affected by this unit. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
36. Formerly S-1511-194

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1547-827-18

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: SE14 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

MODIFICATION TO 62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH COEN ULN LOW NOX BURNER AND FLUE GAS RECIRCULATION (FGR) SYSTEM [FINLEY #11, NORTH MIDWAY] : DELETE/REVISE PSD CONDITIONS

CONDITIONS

1. {1830} 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. {1831} 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 supplier-certified gas delivered and copies of quality terms of supplier-certified 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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 MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

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Arnaud Marjolle, Director of Permit Services

S-1547-827-18 - Jun 18 2014 7:24AM - EDGEHILR - Joint Inspection NOT Required

5. 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 Rule 2520, 9.3.2] 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, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D3246 or grab sample analysis by double GC for H₂S and mercaptans performed in the laboratory. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
7. 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 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
8. {565} 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 equipped with operational fuel gas volumetric flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Annual heat input to steam generator shall not exceed 525.6 billion Btu hhv. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following: PM10: 0.008 lb/MMBtu or 0.303 lb/hr (PSD hourly limit), SOx (as SO₂): 0.003 lb/MMBtu, VOC: 0.003 lb/MMBtu, NOx (as NO₂): 0.018 lb/MMBtu or 15 ppmv @ 3% O₂, or CO: 50 ppmv @ 3% O₂. [District Rules 2201; 4305, 5.1 and 4306, 5.1, PSD SJ 89-02] Federally Enforceable Through Title V Permit
12. Emission rates during 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 4201, 3.0; 4301, 5.2; 4405, 5.2; 4406, 4.2 and 4801, 3.1] Federally Enforceable Through Title V Permit
13. 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
14. Duration of startup and shutdown (as defined in Rule 4306) 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, 5.5 and 4306, 5.3] Federally Enforceable Through Title V Permit
15. 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. Measurement shall be made with the FGR system in the mode of operation (closed or open) in which it was used in the preceding 30 days. 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 and 4306, 5.4] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

16. If the NO_x and/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, 5.4 and 4306, 6.4] Federally Enforceable Through Title V Permit
17. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
18. All emissions measurements for NO_x and CO shall be made with the unit operating either at conditions representative of normal operations or conditions 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 4306. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
19. Source testing to measure natural gas-combustion NO_x 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 and 4306, 6.3] Federally Enforceable Through Title V Permit
20. 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
21. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
22. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (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, SO_x (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, 6.1; 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
23. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
24. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
25. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1; 4306, 6.1 and Rule 4320, 6.1] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

26. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320, 5.1 and 5.3] Federally Enforceable Through Title V Permit
27. Formerly S-1511-239
28. Facility shall operate this unit in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, State and local air quality regulations. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
29. Visible emissions shall not exceed 10% opacity. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
30. Any relaxation in the District's Determination of Compliance conditions, Authority to Construct conditions, Permit to Operate conditions, or any other subsequent permit of legally binding document that could result in an increase of the potential to emit of any pollutant from this source above the PSD applicability thresholds will require a full PSD review of the source as if construction had not yet begun. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
31. Facility shall have legal and operational responsibility and control of all air pollutant emitting activities of the MOCO TEOR project. This responsibility shall include, but not limited to: operating and maintaining the project to comply with all federal, state and local air pollution laws, regulations, permits, orders and other requirements; ensuring the emissions offsets or other reductions required for this project under permits issued by the District are obtained as required; any violation of any air pollution requirements are the legal responsibility of the facility in addition to any other legally responsible parties. Any proposed change to this condition shall require the prior written concurrence of the EPA. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
32. Facility is required to implement the conditions required by the U.S. Fish and Wildlife Service, as outlined in their Biological Opinion and Formal Consultation Response (August 30, 1990), to prevent the incidental taking (killing, harming or harassment) of endangered species that may be affected by this unit. [PSD SJ 89-02] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-1547-828-19

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: SE14 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

MODIFICATION TO 62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH COEN ULN LOW NOX BURNER AND FLUE GAS RECIRCULATION (FINLEY #12, NORTH MIDWAY) : DELETE/REVISE PSD CONDITIONS

CONDITIONS

1. {1830} 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. {1831} 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 supplier-certified gas delivered and copies of quality terms of supplier-certified 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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 MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCD

Arnaud Marjolle, Director of Permit Services

S-1547-828-19 - Jun 18 2014 7:34AM - EDGEHILR - Joint Inspection NOT Required

5. 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 Rule 2520, 9.3.2] 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, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D3246 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rules 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
7. 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 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
8. {565} 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. Duration of start-up and shutdown (as define din Rule 4306) shall not exceed 2 hours each per occurrence. [District Rules 4305, 5.5 and 4306, 5.3] Federally Enforceable Through Title V Permit
10. Duration of refractory curing shall not exceed 30 hours each per occurrence. Permittee shall notify the District in writing prior to refractory curing. [District Rule 2080] Federally Enforceable Through Title V Permit
11. Permittee shall maintain records of duration of each start-up, shutdown and refractory curing, per a period of five years and make such records readily available for District inspection upon request. [District Rule 2080; 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
12. Steam generator shall be equipped with operational fuel gas volumetric flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Annual heat input to steam generator shall not exceed 525.6 billion Btu hhv. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following: PM10: 0.008 lb/MMBtu or 0.303 lb/hr (PSD hourly limit), SOx (as SO2): 0.003 lb/MMBtu, VOC: 0.003 lb/MMBtu, NOx (as NO2): 0.018 lb/MMBtu or 15 ppmv @ 3% O2, or CO: 50 ppmv @ 3% O2. [District Rules 2201; 4305, 5.1 and 4306, 5.1, PSD SJ 89-02] Federally Enforceable Through Title V Permit
15. Emission rates during 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 4201, 3.0; 4301, 5.2; 4405, 5.2; 4406, 4.2 and 4801, 3.1] Federally Enforceable Through Title V Permit
16. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
17. 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. Measurement shall be made with the FGR system in the mode of operation (closed or open) in which it was used in the preceding 30 days. 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 and 4306, 5.4] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

18. If either the NO_x 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
19. Permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
20. During the 36-month source testing interval the operator shall tune the unit at least twice per calendar year, (from four to eight months apart) by a qualified technician in accordance with the procedure described in Rule 4304, and shall monitor, on a monthly basis, the unit's operational characteristics recommended by the manufacturer. Semi-annual tuning is not required if emissions are monitored monthly with a portable analyzer. [District Rules 4305, 6.3 and 4306, 6.3] Federally Enforceable Through Title V Permit
21. All emissions measurements for NO_x and CO shall be made with the unit operating either at conditions representative of normal operations or conditions 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 4306. [District Rules 4305, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
22. Source testing to measure natural gas-combustion NO_x 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 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. 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 and 4306, 6.3] Federally Enforceable Through Title V Permit
23. Whenever the unit is switched to operate with the flue gas recirculation (FGR) system in the closed position, compliance source testing for NO_x 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 Rules 1070 and 2201] Federally Enforceable Through Title V Permit
24. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
25. 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, 7.1] Federally Enforceable Through Title V Permit
26. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (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, SO_x (lb/MMBtu) - EPA Method 6 or 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D4084 or double GC for H₂S and mercaptans performed in a laboratory, fuel gas hhv - D1826 or D1945 in conjunction with ASTM D3588. [District Rules 1081, 6.1; 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
27. 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

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28. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
29. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1; 4306, 6.1 and Rule 4320, 6.1] Federally Enforceable Through Title V Permit
30. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320, 5.1 and 5.3] Federally Enforceable Through Title V Permit
31. Formerly S-1511-240
32. Facility shall operate this unit in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, State and local air quality regulations. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
33. Visible emissions shall not exceed 10% opacity. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
34. Any relaxation in the District's Determination of Compliance conditions, Authority to Construct conditions, Permit to Operate conditions, or any other subsequent permit of legally binding document that could result in an increase of the potential to emit of any pollutant from this source above the PSD applicability thresholds will require a full PSD review of the source as if construction had not yet begun. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
35. Facility shall have legal and operational responsibility and control of all air pollutant emitting activities of the MOCO TEOR project. This responsibility shall include, but not limited to: operating and maintaining the project to comply with all federal, state and local air pollution laws, regulations, permits, orders and other requirements; ensuring the emissions offsets or other reductions required for this project under permits issued by the District are obtained as required; any violation of any air pollution requirements are the legal responsibility of the facility in addition to any other legally responsible parties. Any proposed change to this condition shall require the prior written concurrence of the EPA. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
36. Facility is required to implement the conditions required by the U.S. Fish and Wildlife Service, as outlined in their Biological Opinion and Formal Consultation Response (August 30, 1990), to prevent the incidental taking (killing, harming or harassment) of endangered species that may be affected by this unit. [PSD SJ 89-02] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-1547-829-20

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: SE14 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

MODIFICATION TO 62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER AND FLUE GAS RECIRCULATION (FGR) (FINLEY #13) (NORTH MIDWAY) : DELETE/REVISE PSD CONDITIONS

CONDITIONS

1. {1830} 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. {1831} 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 supplier-certified gas delivered and copies of quality terms of supplier-certified 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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 MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO.

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Arnaud Marjollet, Director of Permit Services

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5. When complying with SO_x 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 Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. If the unit is fired on noncertified gaseous fuel and compliance with SO_x emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D3246 or grab sample analysis by double GC for H₂S and mercaptans performed in the laboratory. [Districts 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
7. 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 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
8. {565} 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 equipped with operational fuel gas volumetric flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Annual heat input to steam generator shall not exceed 525.6 billion Btu hhv. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following: PM₁₀: 0.008 lb/MMBtu or 0.303 lb/hr (PSD hourly limit), SO_x (as SO₂): 0.003 lb/MMBtu, VOC: 0.003 lb/MMBtu, NO_x (as NO₂): 0.018 lb/MMBtu or 15 ppmv @ 3% O₂, or CO: 50 ppmv @ 3% O₂. [District Rules 2201; 4305, 5.1 and 4306, 5.1, PSD SJ 89-02] Federally Enforceable Through Title V Permit
12. Emission rates, except during 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 4201, 3.0; 4301, 5.2; 4405, 5.2; 4406, 4.2 and 4801, 3.1] Federally Enforceable Through Title V Permit
13. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Duration of startup and shutdown (as defined in Rule 4306) 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, 5.5 and 4306, 5.3] Federally Enforceable Through Title V Permit
15. The permittee shall monitor and record the stack concentration of NO_x, 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 and 4306, 5.4] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

16. If either the NO_x 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
17. 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, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
18. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
19. During the 36-month source testing interval the operator shall tune the unit at least twice per calendar year, (from four to eight months apart) by a qualified technician in accordance with the procedure described in Rule 4304, and shall monitor, on a monthly basis, the unit's operational characteristics recommended by the manufacturer. Semi-annual tuning is not required if emissions are monitored monthly with a portable analyzer. [District Rules 4305, 6.3 and 4306, 6.3] Federally Enforceable Through Title V Permit
20. All emissions measurements for NO_x and CO shall be made with the unit operating either at conditions representative of normal operations or conditions 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 4306. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
21. Source testing to measure natural gas-combustion NO_x 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 Rule 2201 and District Rules 4305, 6.3 and 4306, 6.3] Federally Enforceable Through Title V Permit
22. Whenever the unit is switched to operate with the flue gas recirculation (FGR) system in the closed position, compliance source testing for NO_x 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 Rules 1070 and 2201] Federally Enforceable Through Title V Permit
23. 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, 7.1] Federally Enforceable Through Title V Permit
24. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

25. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (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, SO_x (lb/MMBtu) - EPA Method 6 or 6B or 8 or fuel gas sulfur content analysis and EPA Method 19, fuel gas sulfur content - ASTM D1072, D4468, D3246, D4084 or double GC for H₂S and mercaptans performed in a laboratory, fuel gas hhv - D1826 or D1945 in conjunction with ASTM D3588. [District Rules 1081, 6.1; 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
26. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
27. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1 and 4306, 6.1] Federally Enforceable Through Title V Permit
28. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1; 4306, 6.1 and Rule 4320, 6.1] Federally Enforceable Through Title V Permit
29. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NO_x emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NO_x emission limit listed in Rule 4320. [District Rule 4320, 5.1 and 5.3] Federally Enforceable Through Title V Permit
30. Formerly S-1511-241
31. Facility shall operate this unit in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, State and local air quality regulations. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
32. Visible emissions shall not exceed 10% opacity. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
33. Any relaxation in the District's Determination of Compliance conditions, Authority to Construct conditions, Permit to Operate conditions, or any other subsequent permit of legally binding document that could result in an increase of the potential to emit of any pollutant from this source above the PSD applicability thresholds will require a full PSD review of the source as if construction had not yet begun. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
34. Facility shall have legal and operational responsibility and control of all air pollutant emitting activities of the MOCO TEOR project. This responsibility shall include, but not limited to: operating and maintaining the project to comply with all federal, state and local air pollution laws, regulations, permits, orders and other requirements; ensuring the emissions offsets or other reductions required for this project under permits issued by the District are obtained as required; any violation of any air pollution requirements are the legal responsibility of the facility in addition to any other legally responsible parties. Any proposed change to this condition shall require the prior written concurrence of the EPA. [PSD SJ 89-02] Federally Enforceable Through Title V Permit
35. Facility is required to implement the conditions required by the U.S. Fish and Wildlife Service, as outlined in their Biological Opinion and Formal Consultation Response (August 30, 1990), to prevent the incidental taking (killing, harming or harassment) of endangered species that may be affected by this unit. [PSD SJ 89-02] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1547-885-20

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: SE35 TOWNSHIP: 12N RANGE: 24W

EQUIPMENT DESCRIPTION:

MODIFICATION TO 62.5 MMBTU/HR NATURAL GAS (AND VAPOR RECOVERY GAS) FIRED STEAM GENERATOR WITH A COEN ULN BURNER AND FLUE GAS RECIRCULATION (MOCO #803) (SOUTH MIDWAY) : DELETE/REVISE PSD CONDITIONS

CONDITIONS

1. {1830} 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. {1831} 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 supplier-certified gas delivered and copies of quality terms of supplier-certified 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 and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel 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 MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

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Arnaud Marjolle, Director of Permit Services
S-1547-885-20 - Jun 11 2014 2:20PM - EDGEHILR - Joint Inspection NOT Required

5. 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 Rule 2520, 9.3.2] 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, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D3246, D 4084, or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rules 2520, 9.4.2; 4305, 6.2; and 4306, 6.2] Federally Enforceable Through Title V Permit
7. 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, 9.4.2; 4305, 6.2; and 4306, 6.2] Federally Enforceable Through Title V Permit
8. {565} 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 equipped with operational fuel gas volumetric flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Steam generator shall be equipped with operational vapor recovery gas volumetric flow meter whenever unit is connected to the vapor recovery gas supply. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Unit may be disconnected (or reconnected) at the vapor recovery gas supply and the vapor recovery gas volumetric flow meter removed (or replaced). Permittee shall keep a written record of the date(s) when the unit is disconnected (or reconnected) at the vapor recovery gas supply and the vapor recovery gas volumetric flow meter is removed (or replaced). [District Rule 1080] Federally Enforceable Through Title V Permit
12. Emission rates, except during startup, shutdown, and refractory curing, shall not exceed any of the following limits: PM10: 0.005 lb/MMBtu, SOx (as SO2): 0.002 lb/MMBtu, VOC: 0.003 lb/MMBtu, NOx (as NO2): 0.018 lb/MMBtu or 15 ppmv @ 3% O2, or CO: 50 ppmv @ 3% O2. [District Rule 2201; 4305, 5.1; and 4306, 5.1] Federally Enforceable Through Title V Permit
13. Emission rates during 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 4301, 5.2; 4405, 5.2; 4406, 4.2; and 4801, 3.1] Federally Enforceable Through Title V Permit
14. Permittee shall maintain daily records of quantity and higher heating value of natural gas and vapor recovery gas burned in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Duration of startup and shutdown (as defined in Rule 4306) 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, 5.5 and 4306, 5.3] Federally Enforceable Through Title V Permit
16. 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 and 4306, 5.4] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

17. If either the NO_x 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
18. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
19. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
20. 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 Rule 4306. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
21. Source testing to measure natural gas-combustion NO_x 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 and 4306, 6.3] Federally Enforceable Through Title V Permit
22. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5.1 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
23. 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
24. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (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, SO_x (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, 6.1; 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
25. 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 and 4306, 5.5.5] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

26. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 2201 and District Rules 1070; 2520, 9.4.2; 4305, 6.1; and 4306, 6.1] Federally Enforceable Through Title V Permit
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27. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1; 4306, 6.1 and Rule 4320, 6.1] Federally Enforceable Through Title V Permit
28. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320, 5.1 and 5.3] Federally Enforceable Through Title V Permit
29. Facility shall operate this unit in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, State and local air quality regulations. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
30. Visible emissions shall not exceed 10% opacity. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
31. Any relaxation in the District's Determination of Compliance conditions, Authority to Construct conditions, Permit to Operate conditions, or any other subsequent permit of legally binding document that could result in an increase of the potential to emit of any pollutant from this source above the PSD applicability thresholds will require a full PSD review of the source as if construction had not yet begun. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
32. Facility shall have legal and operational responsibility and control of all air pollutant emitting activities of the MOCO TEOR project. This responsibility shall include, but not limited to: operating and maintaining the project to comply with all federal, state and local air pollution laws, regulations, permits, orders and other requirements; ensuring the emissions offsets or other reductions required for this project under permits issued by the District are obtained as required; any violation of any air pollution requirements are the legal responsibility of the facility in addition to any other legally responsible parties. Any proposed change to this condition shall require the prior written concurrence of the EPA. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
33. Facility is required to implement the conditions required by the U.S. Fish and Wildlife Service, as outlined in their Biological Opinion and Formal Consultation Response (August 30, 1990), to prevent the incidental taking (killing, harming or harassment) of endangered species that may be affected by this unit. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
34. Formerly S-1511-379

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1547-1030-15

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: SE35 TOWNSHIP: 12N RANGE: 24W

EQUIPMENT DESCRIPTION:

MODIFICATION TO 62.5 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH A COEN MODEL QLN-ULN LOW NOX BURNER WITH FLUE GAS RECIRCULATION (FGR) (MOCO #805) (SOUTH MIDWAY) : DELETE/REVISE PSD CONDITIONS

CONDITIONS

1. {1830} 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. {1831} 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. 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 MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

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Arnaud Marjolle, Director of Permit Services
S-1547-1030-15 - Jun 11 2014 2:21PM - EDGEHLR : Joint Inspection NOT Required

5. 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 Rule 2520, 9.3.2] 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, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 4468, D 4084, D3246 or grab sample analysis by double GC for H2S and mercaptans performed in the laboratory. [District Rule 2520, 9.4.2; 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
7. 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; and 4306, 6.2] Federally Enforceable Through Title V Permit
8. {565} 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 equipped with operational natural gas volumetric flow meters . [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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): 0.018 lb/MMBtu or 15 ppmv @ 3% O2, or CO: 0.030 lb/MMBtu or 40 ppmv @ 3% O2. [District Rules 2201; 4305, 5.1 and 4306, 5.1] Federally Enforceable Through Title V Permit
11. 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 4301, 5.2; 4405, 5.2; 4406, 4.2 and 4801, 3.1] Federally Enforceable Through Title V Permit
12. 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: 4.5 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
13. Duration of startup and shutdown (as defined in Rule 4306) 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, 5.5 and 4306, 5.3] Federally Enforceable Through Title V Permit
14. 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 and 4306, 5.4] Federally Enforceable Through Title V Permit

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15. If either the NO_x 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 the performing the notification and testing required by this condition. [District Rules 4305, 5.4 and 4306, 5.4] Federally Enforceable Through Title V Permit
16. 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, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
17. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 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 and 4306, 5.4] Federally Enforceable Through Title V Permit
18. 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. 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 4306. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit
19. Source testing to measure natural gas-combustion NO_x 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 and 4306, 6.3] Federally Enforceable Through Title V Permit
20. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 5.5 and 4306, 5.5] Federally Enforceable Through Title V Permit
21. 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, 7.1] Federally Enforceable Through Title V Permit
22. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, NO_x (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, SO_x (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, 6.1; 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
23. 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 and 4306, 5.5] Federally Enforceable Through Title V Permit

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24. 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, 4.0; 4305, 6.2 and 4306, 6.2] Federally Enforceable Through Title V Permit
- ~~25. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4.0; 4305, 6.1; 4306, 6.1 and Rule 4320, 6.1] Federally Enforceable Through Title V Permit~~
26. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320, 5.1 and 5.3] Federally Enforceable Through Title V Permit
27. Facility shall operate this unit in compliance with all other applicable provisions of 40 CFR Parts 52, 60 and 61 and all other applicable federal, State and local air quality regulations. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
28. Visible emissions shall not exceed 10% opacity. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
29. Any relaxation in the District's Determination of Compliance conditions, Authority to Construct conditions, Permit to Operate conditions, or any other subsequent permit of legally binding document that could result in an increase of the potential to emit of any pollutant from this source above the PSD applicability thresholds will require a full PSD review of the source as if construction had not yet begun. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
30. Facility shall have legal and operational responsibility and control of all air pollutant emitting activities of the MOCO TEOR project. This responsibility shall include, but not limited to: operating and maintaining the project to comply with all federal, state and local air pollution laws, regulations, permits, orders and other requirements; ensuring the emissions offsets or other reductions required for this project under permits issued by the District are obtained as required; any violation of any air pollution requirements are the legal responsibility of the facility in addition to any other legally responsible parties. Any proposed change to this condition shall require the prior written concurrence of the EPA. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
31. Facility is required to implement the conditions required by the U.S. Fish and Wildlife Service, as outlined in their Biological Opinion and Formal Consultation Response (August 30, 1990), to prevent the incidental taking (killing, harming or harassment) of endangered species that may be affected by this unit. [PSD SJ 89-01] Federally Enforceable Through Title V Permit
32. NOTE: Formerly S-1511-378

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