

FEB 22 2017

Gregory Pritchett
Chevron USA, Inc.
PO Box 1392
Bakersfield, CA 93302

Re: Notice of Preliminary Decision – Emission Reduction Credits
Facility Number: S-55
Project Number: S-1154368

Dear Mr. Pritchett:

Enclosed for your review and comment is the District's analysis of Chevron USA, Inc.'s application for Emission Reduction Credits (ERCs) resulting from the shutdown of two IC engines, near Lost Hills, CA. The quantity of ERCs proposed for banking is 284 lb-NOx/yr, 1,295 lb-PM10/yr and 3,744 lb-CO/yr.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice comment period, the District intends to issue the ERCs. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. David Torii of Permit Services at (661) 392-5620.

Sincerely,



Arnaud Marjollet
Director of Permit Services

AM:dbt

Enclosures

cc: Tung Le, 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

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Southern Region
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Bakersfield, CA 93308-9725
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San Joaquin Valley Air Pollution Control District ERC Banking Application Review

Facility Name: Chevron USA, Inc. Date: 1/17/17
Mailing Address: PO Box. 1392 Engineer: David Torii
Bakersfield, CA 93302 Lead Engineer: Rich Karrs
Contact Person: Lance Ericksen
Telephone: (661) 654-7145
Project #: S-1154368
Received: 12/22/15
Deemed Complete: 1/20/16
ERC #s: S-4659-2, '3 and '4

I. Summary

Chevron USA, Inc. (CUSA) shutdown natural gas-fired internal combustion engines (S-55-13 and '14) in December 2015. Subsequently, the facility submitted this application to bank actual emission reductions (AER) resulting from shutdown of the engines. See the Permits to Operate (PTOs) in **Appendix B**.

The following emission reductions have been found to qualify for ERC banking:

	NO _x [lb/qtr.]	PM ₁₀ [lb/qtr.]	CO [lb/qtr.]
1st Quarter	72	328	949
2nd Quarter	68	306	885
3rd Quarter	74	337	975
4th Quarter	72	324	935
Total	286	1,295	3,744

II. Applicable Rules

Rule 2301 Emission Reduction Credit Banking (1/19/12)

III. Location of Reduction

The equipment was located at the Lost Hills Gas Processing facility in the Section 3, Township 27S, Range 21E in Kern County.

IV. Method of Generating Reductions

The emission reductions are generated by the permanent shutdown of two 1680 bhp Waukeshia model 7044GSI rich burn natural gas-fired IC engines S-55-13 and '14 powering gas compressors. The engines' workload has been taken over by the facility's electric compression operation (S-55-9).

Equipment Description

- S-55-13: GAS COMPRESSION OPERATION INCLUDING ONE 1680 HP WAUKESHA MODEL 7044GSI NATURAL GAS-FIRED IC ENGINE WITH DCL INDUSTRIES MODEL 2-DC76-14 3-WAY CATALYST, AND A AIR/FUEL RATIO CONTROLLER DRIVING A THREE-STAGE GAS COMPRESSOR
- S-55-14: GAS COMPRESSION OPERATION INCLUDING ONE 1680 HP WAUKESHA MODEL 7044GSI NATURAL GAS-FIRED IC ENGINE WITH DCL INDUSTRIES MODEL 2-DC76-14 3-WAY CATALYST, AND AN AIR/FUEL RATIO CONTROLLER DRIVING A THREE-STAGE GAS COMPRESSOR

V. Calculations**A. Assumptions and Emission Factors****Assumptions**

- Two-year baseline period selected for calculation of AER is 12/1/2011 through 11/30/2013
- Annual emissions will be rounded to the nearest pound in accordance with District Policy APR-1105 (dated 7/16/1992).
- The engines were fired on public utility commission (PUC) quality natural gas per PTOs.
- Natural Gas Heating Value is 1,020 Btu/scf (typical for PUC gas)

Emission Factors (EF)PM10 Emissions Factor

No PM10 source tests were performed for the engines; therefore, the PTO's PM10 emission limit/factor was used.

Emissions factors for NO_x, and CO were calculated based of the engines' source test data summarized below (see Appendix D for source test data).

	Source Test Date	ppmv @15% O ₂	
		NO _x	CO
S-55-13	12/15/10	0.16	6.0
S-55-13	10/11/13	-	6.0
S-55-13	12/31/14	2.0	44.0
S-55-14	12/15/10	0.01	11.1
S-55-14	1/10/13	0.22	1.3
S-55-14	1/11/13	-	8.0
	Total	2.39	76.4
	Ave	0.60	12.7
	lb/MMBtu	0.0022	0.0289

The emission factor derivation calculations are shown below:

NOx Emissions Factor

Equation:

$$\text{NOx (lb. /MMBtu)} = \text{ppm} \times 1/\text{molar volume} \times \text{MW} \times \text{Fd} \times 20.9 / (20.9 - \%O_2)$$

Where:

$$\text{ppm} = 0.60 \text{ ppm @ } 15\%O_2 \text{ engine source test average}$$

$$\text{molar volume} = 379.5 \text{ dscf/lbmol @ } 14.696 \text{ psia, } 70 \text{ deg. F}$$

$$\text{MW} = \text{molecular weight, lb. /lb-mol}$$

$$\text{Fd} = 8710 \text{ dscf/MMBtu for natural gas @ } 70 \text{ deg F}$$

Therefore:

$$\text{NOx (lb./MMBtu)} = 0.60 \text{ E-06 ft}^3 \times 1/379.5 \text{ dscf/lb-mol} \times 46 \text{ lb./lb-mol} \times 8710 \text{ dscf/MMBtu} \times 20.9 / (20.9 - 15.0)$$

$$\text{NOx (lb. /MMBtu)} = 0.0022$$

CO Emissions Factor

Equation:

$$\text{CO (lb. /MMBtu)} = \text{ppm} \times 1/\text{molar volume} \times \text{MW} \times \text{Fd} \times 20.9 / (20.9 - \%O_2)$$

Where:

$$\text{ppm} = 12.7 \text{ ppm @ } 15\% O_2 \text{ engine source test average}$$

$$\text{molar volume} = 379.5 \text{ dscf/lb. mol @ } 14.7 \text{ psia, } 70 \text{ deg. F}$$

$$\text{MW} = \text{molecular weight, lb. /lb-mol}$$

$$\text{Fd} = 8710 \text{ dscf/MMBtu for } 1020 \text{ Btu/scf Natural Gas @ } 70 \text{ deg F}$$

Therefore,

$$\text{CO (lb. /MMBtu)} = 12.7 \text{ E-06} \times 1/379.5 \text{ dscf/lb-mol} \times 28 \text{ lb./lb-mol} \times 8710 \text{ dscf/MMBtu} \times 20.9 / (20.9 - 15.0)$$

$$\text{CO (lb. /MMBtu)} = 0.0289$$

The emissions factors are summarized below:

Natural Gas Emission Factors		
Pollutant	Emissions Factors (lb/MMBtu)	Source
NOx	0.0022	Engine source tests
PM10	0.01	PTOs
CO	0.0289	Engine source tests

B. Baseline Period Determination

Pursuant to Rule 2301, Section 3.6, the Baseline Period is the same as defined in Rule 2201, which is:

The two consecutive years of operation immediately prior to the submission date of the complete application; or at least two consecutive years within the five years immediately prior to the submission date of the complete application if determined by the APCO as more representative of normal source operation.

The baseline period from 12/1/2011 to 11/30/2013 was determined to be more representative of normal source operation than the two years immediately prior to submission of the banking application. The baseline period was calculated by determining the normal source operation (NSO) average fuel use for the last nine years; comparing the fuel use for the last five years, and establishing the two year period within the last five years closest to the NSO nine year average as the baseline period. See fuel use and NSO data in Appendix C.

C. Baseline Data

The baseline natural gas-use is taken from the annual fuel-use records that have been supplied by the applicant, as posted in the following table.

Fuel Usage (MMBtu)						
Month/Year	Year					
	Quarter	2011	2012	2013	Total Quarterly Fuel Use	Average Fuel Used for 2012 and 2013
Jan	1 st		12,852	12,925	72,985	36,493
Feb	1 st		11,586	10,857		
Mar	1 st		11,003	13,762		
Apr	2 nd		9,568	12,291	68,056	34,028
May	2 nd		13,250	12,844		
Jun	2 nd		13,406	6,697		
Jul	3 rd		13,977	6,029	74,936	37,468
Aug	3 rd		14,010	12,457		
Sep	3 rd		14,745	13,718		
Oct	4 th		14,425	13,352	71,906	35,953
Nov	4 th		12,758	13,687		
Dec	4 th	10,512	7,172			

D. Historical Actual Emissions (HAE)

The HAE from the fuel use is determined by multiplying the average quarterly fuel-use by the emission factor presented above.

Criteria Emissions During Baseline Period (lb./qtr.) (HAE)			
	NO _x	PM10	CO
1st Quarter	80	365	1,055
2nd Quarter	75	340	983
3rd Quarter	82	375	1,083
4th Quarter	79	360	1,039

The Air Quality Improvement Deduction (AQID) is 10% of the AER per Rule 2201, Sections 3.6 and 4.12.1, and is summarized as follows:

Air Quality Improvement Deduction (AQID) lb./qtr. (AQID = AER x 10%)			
	NO _x	PM10	CO
1st Quarter	8	36	105
2nd Quarter	7	34	98
3rd Quarter	8	37	108
4th Quarter	8	36	104

E. Post Project Potential to Emit (PE2)

As discussed above, the subject equipment has been permanently shut down and its PTOs surrendered. Therefore the PE2s for NOx, PM10, and CO are zero.

F. Emission Reductions Eligible for Banking

The emission reductions eligible for banking are the difference between the historical actual emissions and the potential to emit after the project minus the air quality improvement deduction.

Criteria Emissions Eligible for Banking (lb. /qtr.)			
	NOx	PM10	CO
1st Quarter	72	328	949
2nd Quarter	68	306	885
3rd Quarter	74	337	975
4th Quarter	72	324	935

VI. Compliance

Rule 2301 – Emissions Reduction Credit Banking

To comply with the definition of Actual Emissions Reductions (Rule 2201, Section 3.2.1), the reductions must be real, enforceable, quantifiable, permanent, and surplus.

A. Real

The emission reductions were generated by the shutdown of two natural gas-fired internal combustion engines powering natural gas compressors. The engines' workload has been taken over by the facility's electric compression operation (S-55-9). Emission reductions have been calculated based on actual heat input to the engines and certified source test results and recognized emission factors for the baseline period. Therefore, the reductions are real.

B. Enforceable

The PTOs for the natural gas-fired internal combustion engines have been surrendered. Operation of the equipment without a valid permit would subject the Permittee to enforcement actions. Therefore, the reductions are enforceable.

C. Quantifiable

The reductions are quantifiable since they were calculated from historic fuel use data, source testing data, established and accepted emission factors, permitted limits, and methods according to District Rule 2201. Therefore, the reductions are quantifiable.

D. Permanent

The natural gas-fired internal combustion engines have been shut down and the PTOs surrendered. The gas formerly compressed by the IC engines is currently compressed by electric motor-powered compressors.

E. Surplus

To be considered surplus, Actual Emission Reductions shall be in excess, at the time the application for an Emission Reduction Credit or an Authority to Construct authorizing such reductions is deemed complete, of any emissions reduction which:

- *Is required or encumbered by any laws, rules, regulations, agreements, orders, or*
- *Is attributed to a control measure noticed for workshop, or proposed or contained in a State Implementation Plan, or*
- *Is proposed in the APCO's adopted air quality plan pursuant to the California Clean Air Act.*

At the time of the shutdown and subsequent permit surrender, the units involved were in compliance with current and any known future requirements of all applicable rules and regulations. Therefore, the reductions are surplus.

F. Not used for the Approval of an Authority to Construct or as Offsets

The emission reduction credits generated by the shutdown of natural gas-fired internal combustion engine will not be used for the approval of any Authority to Construct or used as mitigating offsets for approval of other equipment. See section VI.A, above.

G. Timely Submittal

Section 4.2.3 of Rule 2301 – Emissions Reduction Credit Banking (1/19/12) states that ERC certificate applications for reductions shall be submitted within 180 days after the emission reduction occurs. The ERC application was received on 12/22/15. The engines ceased operation in December of 2015. Therefore, the application was submitted in a timely fashion.

VII. Recommendation

Issue the ERC Certificates in the amount posted in the table below and on the Draft ERC Certificates in Appendix A.

Summary of ERC Amounts (lb)			
	NO_x	PM₁₀	CO
ERC Number	S-4659-2	S-4659-4	S-4659-3
1 st Quarter	72	328	949
2 nd Quarter	68	306	885
3 rd Quarter	74	337	975
4 th Quarter	72	324	935
Total Per Year	286	1,295	3,744

List of Appendixes

- A. Draft Emission Reduction Credit Certificates
- B. Surrendered PTO
- C. NSO and Historical Fuel Use Data
- D. Engine Source Test Results

Appendix A
Draft ERC Certificates

San Joaquin Valley
Air Pollution Control District

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308

Emission Reduction Credit Certificate

S-4659-2

DRAFT

ISSUED TO: CHEVRON USA INC LOST HILLS GP
ISSUED DATE: <DRAFT>
LOCATION OF REDUCTION: LOST HILLS GAS PLANT
LOST HILLS, CA

For NOx Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
72 lbs	68 lbs	74 lbs	72 lbs

Method Of Reduction

- Shutdown of Entire Stationary Source
- Shutdown of Emissions Units
- Other

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Seyed Sadredin, Executive Director / APCO

DRAFT

Arnaud Marjollet, Director of Permit Services

San Joaquin Valley
Air Pollution Control District

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308

Emission Reduction Credit Certificate

DRAFT
S-4659-3

ISSUED TO: CHEVRON USA INC LOST HILLS GP

ISSUED DATE: <DRAFT>

LOCATION OF REDUCTION: LOST HILLS GAS PLANT
LOST HILLS, CA

For CO Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
949 lbs	885 lbs	975 lbs	935 lbs

Method Of Reduction

- Shutdown of Entire Stationary Source
- Shutdown of Emissions Units
- Other

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Seyed Sadredin, Executive Director / APCO

DRAFT

Arnaud Marjollet, Director of Permit Services

San Joaquin Valley
Air Pollution Control District

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308

Emission Reduction Credit Certificate

DRAFT
DS-4659-4

ISSUED TO: CHEVRON USA INC LOST HILLS GP

ISSUED DATE: <DRAFT>

LOCATION OF REDUCTION: LOST HILLS GAS PLANT
LOST HILLS, CA

For PM10 Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
328 lbs	306 lbs	337 lbs	324 lbs

Portion of above PM10 Reductions that is PM2.5:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
100.0%	100.0%	100.0%	100.0%
328 lbs	306 lbs	337 lbs	324 lbs

Method Of Reduction

- Shutdown of Entire Stationary Source
- Shutdown of Emissions Units
- Other

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Seyed Sadredin, Executive Director / APCO

DRAFT

Arnaud Marjollet, Director of Permit Services

Appendix B
Surrendered PTOs

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-55-13-11

EXPIRATION DATE: 08/31/2016

SECTION: SW03 TOWNSHIP: 27S RANGE: 21E

EQUIPMENT DESCRIPTION:

GAS COMPRESSION OPERATION INCLUDING ONE 1680 HP WAUKESHA MODEL 7044GSI NATURAL GAS-FIRED IC ENGINE WITH DCL INDUSTRIES MODEL 2-DC76-14 3-WAY CATALYST, AND A AIR/FUEL RATIO CONTROLLER DRIVING A THREE-STAGE GAS COMPRESSOR:

PERMIT UNIT REQUIREMENTS

1. This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201]
2. The engine shall be equipped with a turbocharger and with an intercooler. [District Rule 2201]
3. This IC engine shall be fired on Public Utility Commission (PUC) quality natural gas with a sulfur content not exceeding 1.0 grains/100 scf. [District Rules 2201, 4801]
4. Compressor shall be reciprocating type only and shall be in wet gas service only. [District Rules 2201, 4001]
5. This engine shall be equipped with an operational nonresettable elapsed time meter or other APCO approved alternative. [District Rule 4702]
6. VOC emissions from fugitive components associated with this engine/compressor shall not exceed 2.0 lb VOC per day. [District Rule 2201]
7. VOC emission rate from all compression operations shall not exceed 0.66 lb/hr from fugitive sources. [District NSR Rule]
8. Emissions from the IC engine when operating under load shall not exceed any of the following limits: 11 ppmv-NO_x @ 15% O₂, 30 ppmv-VOC @ 15% O₂, 270 ppmv-CO @ 15% O₂, 0.00285 lb-SO_x/MMBtu, or 10 lb-PM₁₀/MMscf. [District Rules 2201, 4702]
9. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Source testing emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (Amended December 16, 1993), of 3 thirty-minute test runs for NO_x. [District Rules 4702]
10. Compliance demonstration (source testing) shall be by District witnessed or authorized by District personnel. [District Rule 1081]
11. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
12. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
13. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
14. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

15. The permittee shall monitor and record the stack concentration of NO_x (as NO₂), CO, and O₂ at least once every calendar month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702]
16. If either the NO_x or CO concentrations corrected to 15% O₂, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall notify the District within the following 1-hour, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4702]
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 Rule 4702]
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 15% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702]
19. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified in the Inspection and Maintenance (I & M) plan submitted to the District. [District Rule 4702]
20. The permittee shall update the I & M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I & M plan and must submit an updated I & M plan to the APCO no later than 14 days after the change for approval. The date and time of the change to the I & M plan shall be recorded in the engine's operating log. For modifications, the revised I & M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I & M plan at any time. [District Rule 4702]
21. The permittee shall maintain, and make available for District inspection, all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 4702]
22. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 25 or EPA Method 18 referenced as methane, fuel gas sulfur content - ASTM D 3246 or double GC for total sulfur content, and EPA Method 21 for fugitive components. [District Rule 1081]
23. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801]
24. Sulfur content of the natural gas being fired in the engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246, or double GC for H₂S and mercaptans. [District Rule 1081]
25. Sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201]

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

26. Permittee shall maintain an engine operating log, on a monthly basis, which includes the following information; total hours of operation, type and quantity of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance with Rule 4702. [District Rules 1070]
27. All records required by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District Rule 4702]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-55-14-11

EXPIRATION DATE: 08/31/2016

SECTION: SW03 TOWNSHIP: 27S RANGE: 21E

EQUIPMENT DESCRIPTION:

GAS COMPRESSION OPERATION INCLUDING ONE 1680 HP WAUKESHA MODEL 7044GSI NATURAL GAS-FIRED IC ENGINE WITH DCL INDUSTRIES MODEL 2-DC76-14 3-WAY CATALYST, AND AN AIR/FUEL RATIO CONTROLLER DRIVING A THREE-STAGE GAS COMPRESSOR:

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1. This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201]
2. The engine shall be equipped with a turbocharger and with an intercooler. [District Rule 2201]
3. This IC engine shall be fired on Public Utility Commission (PUC) quality natural gas with a sulfur content not exceeding 1.0 grains/100 scf. [District Rules 2201, 4801]
4. Compressor shall be reciprocating type only and shall be in wet gas service only. [District Rules 2201, 4001]
5. This engine shall be equipped with an operational nonresettable elapsed time meter or other APCO approved alternative. [District Rule 4702]
6. VOC emissions from fugitive components associated with this engine/compressor shall not exceed 2.0 lb VOC per day. [District Rule 2201]
7. VOC emission rate from all compression operations shall not exceed 0.66 lb/hr from fugitive sources. [District 2201 Rule]
8. Emissions from the IC engine when operating under load shall not exceed any of the following limits: 11 ppmv-NOx @ 15% O₂, 30 ppmv-VOC @ 15% O₂, 270 ppmv-CO @ 15% O₂, 0.00285 lb-SO_x/MMBtu, or 10 lb- PM₁₀/MMscf. [District Rules 2201, 4702]
9. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Source testing emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (Amended December 16, 1993), of 3 thirty-minute test runs for NOx. [District Rule 4702]
10. Compliance demonstration (source testing) shall be by District witnessed or authorized by District personnel. [District Rule 1081]
11. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
12. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
13. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
14. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

15. The permittee shall monitor and record the stack concentration of NO_x (as NO₂), CO, and O₂ at least once every calendar month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702]
16. If either the NO_x or CO concentrations corrected to 15% O₂, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall notify the District within the following 1-hour, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4702]
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 Rule 4702]
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 15% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702]
19. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified in the Inspection and Maintenance (I & M) plan submitted to the District. [District Rule 4702]
20. The permittee shall update the I & M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I & M plan and must submit an updated I & M plan to the APCO no later than 14 days after the change for approval. The date and time of the change to the I & M plan shall be recorded in the engine's operating log. For modifications, the revised I & M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I & M plan at any time. [District Rule 4702]
21. The permittee shall maintain, and make available for District inspection, all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 4702]
22. The following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 25 or EPA Method 18 referenced as methane, fuel gas sulfur content - ASTM D 3246 or double GC for total sulfur content, and EPA Method 21 for fugitive components. [District Rule 1081]
23. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801]
24. Sulfur content of the natural gas being fired in the engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246, or double GC for H₂S and mercaptans. [District Rule 1081]
25. Sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

26. Permittee shall maintain an engine operating log, on a monthly basis, which includes the following information; total hours of operation, type and quantity of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance with Rule 4702. [District Rule 1070]
27. All records required by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District Rule 4702]

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

Appendix C

NSO and Historical Fuel Use Data

Normal Source Operation K5 and K6

Month	Total		
	MSCF	Btu/scf	MMBtu
Dec-05		1,020	
Jan-06	11,745	1,020	11,980
Feb-06	11,101	1,020	11,323
Mar-06	11,988	1,020	12,228
Apr-06	11,125	1,020	11,348
May-06	12,052	1,020	12,293
Jun-06	11,015	1,020	11,235
Jul-06	8,665	1,020	8,838
Aug-06	12,746	1,020	13,001
Sep-06	12,559	1,020	12,810
Oct-06	12,594	1,020	12,846
Nov-06	13,391	1,020	13,659
Dec-06	10,509	1,020	10,719
Jan-07	11,658	1,020	11,891
Feb-07	11,745	1,020	11,980
Mar-07	12,173	1,020	12,416
Apr-07	10,055	1,020	10,256
May-07	7,761	1,020	7,916
Jun-07	10,279	1,020	10,485
Jul-07	12,445	1,020	12,694
Aug-07	13,108	1,020	13,370
Sep-07	12,203	1,020	12,447
Oct-07	11,332	1,020	11,559
Nov-07	12,558	1,020	12,809
Dec-07	11,785	1,020	12,021
Jan-08	12,687	1,020	12,941
Feb-08	12,754	1,020	13,009
Mar-08	10,642	1,020	10,855
Apr-08	11,434	1,020	11,663
May-08	11,045	1,020	11,266
Jun-08	11,071	1,020	11,292
Jul-08	11,777	1,020	12,013
Aug-08	11,012	1,020	11,232
Sep-08	9,917	1,020	10,115
Oct-08	11,245	1,020	11,470
Nov-08	11,119	1,020	11,341
Dec-08	11,683	1,020	11,917
Jan-09	15,049	1,020	15,350
Feb-09	11,246	1,020	11,471
Mar-09	15,125	1,020	15,428
Apr-09	13,874	1,020	14,151
May-09	15,220	1,020	15,524
Jun-09	10,234	1,020	10,439
Jul-09	14,069	1,020	14,350
Aug-09	14,505	1,020	14,795
Sep-09	14,413	1,020	14,701
Oct-09	13,963	1,020	14,242
Nov-09	13,584	1,020	13,856
Dec-09	9,899	1,020	10,097
Jan-10	12,506	1,020	12,756
Feb-10	11,893	1,020	12,131
Mar-10	13,100	1,020	13,362
Apr-10	12,705	1,020	12,969
May-10	13,453	1,020	13,722
Jun-10	12,646	1,020	12,899
Jul-10	12,647	1,020	12,900
Aug-10	12,864	1,020	13,121
Sep-10	12,980	1,020	13,240
Oct-10	12,737	1,020	12,992
Nov-10	12,448	1,020	12,697
Dec-10	13,208	1,020	13,472

Jan-11	13,515	1,020	13,785
Feb-11	12,264	1,020	12,509
Mar-11	13,177	1,020	13,441
Apr-11	12,707	1,020	12,961
May-11	12,951	1,020	13,210
Jun-11	13,042	1,020	13,303
Jul-11	12,888	1,020	13,146
Aug-11	10,732	1,020	10,947
Sep-11	11,013	1,020	11,233
Oct-11	11,017	1,020	11,237
Nov-11	7,372	1,020	7,519
Dec-11	10,306	1,020	10,612
Jan-12	12,600	1,020	12,852
Feb-12	11,359	1,020	11,586
Mar-12	10,787	1,020	11,003
Apr-12	9,380	1,020	9,568
May-12	12,990	1,020	13,250
Jun-12	13,143	1,020	13,406
Jul-12	13,703	1,020	13,977
Aug-12	13,735	1,020	14,010
Sep-12	14,456	1,020	14,745
Oct-12	14,142	1,020	14,425
Nov-12	12,508	1,020	12,758
Dec-12	7,031	1,020	7,172
Jan-13	12,672	1,020	12,925
Feb-13	10,644	1,020	10,857
Mar-13	13,492	1,020	13,762
Apr-13	12,050	1,020	12,291
May-13	12,592	1,020	12,844
Jun-13	6,566	1,020	6,697
Jul-13	5,911	1,020	6,029
Aug-13	12,213	1,020	12,457
Sep-13	13,449	1,020	13,718
Oct-13	13,090	1,020	13,352
Nov-13	13,418	1,020	13,687
Dec-13	13,534	1,020	13,805
Jan-14	14,060	1,020	14,341
Feb-14	12,737	1,020	12,991
Mar-14	13,736	1,020	14,011
Apr-14	13,256	1,020	13,521
May-14	4,516	1,020	4,606
Jun-14	7,179	1,020	7,322
Jul-14	11,343	1,020	11,570
Aug-14	13,345	1,020	13,612
Sep-14	12,074	1,020	12,233
Oct-14	13,907	1,020	14,185
Nov-14	12,651	1,020	12,904
Dec-14	11,456	1,020	11,685
Jan-15	7,509	1,020	7,659
Feb-15	0	1,020	0
Mar-15	0	1,020	0
Apr-15	12,539	1,020	12,790
May-15	15,162	1,020	15,465
Jun-15	13,236	1,020	13,501
Jul-15	11,301	1,020	11,527
Aug-15	10,666	1,020	10,879
Sep-15	12,811	1,020	12,863
Oct-15	11,565	1,020	11,796
Nov-15	10,506	1,020	10,717
Dec-15		1,020	

NSO Average

12,000

Historical Actual Emissions (HAE)

Month	Total			24 Month Block Differences vs NSO	36 Month Block Differences vs NSO	48 Month Block Differences vs NSO
	MSCF	Btu/scf	MMBtu			
Dec-10	13,208	1,020	13,472			
Jan-11	13,515	1,020	13,785			
Feb-11	12,284	1,020	12,509			
Mar-11	13,177	1,020	13,441			
Apr-11	12,707	1,020	12,981			
May-11	12,951	1,020	13,210			
Jun-11	13,042	1,020	13,303			
Jul-11	12,888	1,020	13,148			
Aug-11	10,732	1,020	10,947			
Sep-11	11,013	1,020	11,233			
Oct-11	11,017	1,020	11,237			
Nov-11	7,372	1,020	7,519			
Dec-11	10,306	1,020	10,512			
Jan-12	12,600	1,020	12,862			
Feb-12	11,359	1,020	11,586			
Mar-12	10,787	1,020	11,003			
Apr-12	9,380	1,020	9,568			
May-12	12,990	1,020	13,250			
Jun-12	13,143	1,020	13,406			
Jul-12	13,703	1,020	13,877			
Aug-12	13,735	1,020	14,010			
Sep-12	14,458	1,020	14,746			
Oct-12	14,142	1,020	14,425			
Nov-12	12,508	1,020	12,758	452		
Dec-12	7,031	1,020	7,172	190		
Jan-13	12,672	1,020	12,925	154		
Feb-13	10,844	1,020	10,867	85		
Mar-13	13,492	1,020	13,782	89		
Apr-13	12,050	1,020	12,281	71		
May-13	12,582	1,020	12,844	55		
Jun-13	6,588	1,020	6,897	220		
Jul-13	5,911	1,020	6,029	518		
Aug-13	12,213	1,020	12,467	454		
Sep-13	13,449	1,020	13,718	350		
Oct-13	13,090	1,020	13,362	262		
Nov-13	13,418	1,020	13,687	5	74	
Dec-13	13,534	1,020	13,805	132	83	
Jan-14	14,080	1,020	14,341	184	88	
Feb-14	12,737	1,020	12,981	253	112	
Mar-14	13,738	1,020	14,011	378	127	
Apr-14	13,258	1,020	13,521	543	143	
May-14	4,516	1,020	4,806	183	96	
Jun-14	7,179	1,020	7,322	71	282	
Jul-14	11,343	1,020	11,570	171	308	
Aug-14	13,345	1,020	13,612	189	232	
Sep-14	12,974	1,020	13,233	251	178	
Oct-14	13,907	1,020	14,185	281	94	
Nov-14	12,661	1,020	12,904	255	55	99
Dec-14	11,458	1,020	11,685	66	89	8
Jan-15	7,508	1,020	7,659	286	67	38
Feb-15	0	1,020	0	738	378	82
Mar-15	0	1,020	0	1,312	884	89
Apr-15	12,539	1,020	12,790	1,281	595	62
May-15	15,162	1,020	15,485	1,182	533	85
Jun-15	13,236	1,020	13,501	898	630	327
Jul-15	11,301	1,020	11,527	668	588	607
Aug-15	10,666	1,020	10,879	735	685	810
Sep-15	12,611	1,020	12,863	770	788	583
Oct-15	11,565	1,020	11,798	835	811	558
Nov-15	10,506	1,020	10,717	859	887	593

Appendix D

Engine Source Test Results

S-55-13

12/15/10

Facility: S 55 CHEVRON USA INC LOST HILLS GP	Permit ID: 13	Mod#: 5					
Test Tracking	Periodic Test Setup	Test Equipment Details					
Test Result Details							
Representative Test							
Unit Identification: CAHN GP K-5 1 Unit Total	Description: <input style="width:100%;" type="text"/>	<input type="button" value="Add New Unit"/> <input type="button" value="Save"/> <input type="button" value="Cancel"/>					
Test Results For: CAHN GP K-5							
Pollutant	Units	Limit	Result	Failed	O2 Correction (%)	# Runs	Description
CO	ppm	70.0	6.0	<input type="checkbox"/>	15	3	
Fuel S	lbs/MMBtu SO2	0.00285	0.0002	<input type="checkbox"/>		3	
NOx	ppm	25.0	0.16	<input type="checkbox"/>	15	3	
VOC	ppm	30.0	0.0	<input type="checkbox"/>	15	3	

10/11/13

Facility: S 55 CHEVRON USA INC LOST HILLS GP	Permit ID: 13	Mod#: 6					
Test Tracking	Periodic Test Setup	Test Equipment Details					
Test Result Details							
Representative Test							
Unit Identification: K-5, SUB ZZZZ 1 Unit Total	Description: <input style="width:100%;" type="text"/>	<input type="button" value="Add New Unit"/> <input type="button" value="Save"/> <input type="button" value="Cancel"/>					
Test Results For: K-5, SUB ZZZZ							
Pollutant	Units	Limit	Result	Failed	O2 Correction (%)	# Runs	Description
CO	ppm	270.0	6.0	<input type="checkbox"/>	15	3	

S-55-13

12/31/14

Facility: S 55 CHEVRON USA INC LOST HILLS GP	Permit ID: 13	Mod#: 8
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Test Tracking	Periodic Test Setup	Test Equipment Details	Test Result Details																																																
<p>Representative Test</p> <p>Unit Identification: CAHN GP K-5 1 Unit Total</p> <p>Description: <input type="text"/></p> <p>Add New Unit Save Cancel</p>																																																			
<p>Test Results For: CAHN GP K-5</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units</th> <th>Limit</th> <th>Result</th> <th>Failed</th> <th>O2 Correction (%)</th> <th># Runs</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>CO</td> <td>ppm</td> <td>70.0</td> <td>44.0</td> <td><input type="checkbox"/></td> <td>15</td> <td>3</td> <td></td> </tr> <tr> <td>Fuel S</td> <td>gr/100scf</td> <td>1.0</td> <td>0.06</td> <td><input type="checkbox"/></td> <td></td> <td>3</td> <td></td> </tr> <tr> <td>NOx</td> <td>ppm</td> <td>11.0</td> <td>2.0</td> <td><input type="checkbox"/></td> <td>15</td> <td>3</td> <td></td> </tr> <tr> <td>SO2</td> <td>lb/MMBtu</td> <td>0.00285</td> <td>0.0002</td> <td><input type="checkbox"/></td> <td></td> <td>3</td> <td></td> </tr> <tr> <td>VOC</td> <td>ppm</td> <td>30.0</td> <td>0.0</td> <td><input type="checkbox"/></td> <td>15</td> <td>3</td> <td></td> </tr> </tbody> </table>				Pollutant	Units	Limit	Result	Failed	O2 Correction (%)	# Runs	Description	CO	ppm	70.0	44.0	<input type="checkbox"/>	15	3		Fuel S	gr/100scf	1.0	0.06	<input type="checkbox"/>		3		NOx	ppm	11.0	2.0	<input type="checkbox"/>	15	3		SO2	lb/MMBtu	0.00285	0.0002	<input type="checkbox"/>		3		VOC	ppm	30.0	0.0	<input type="checkbox"/>	15	3	
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SO2	lb/MMBtu	0.00285	0.0002	<input type="checkbox"/>		3																																													
VOC	ppm	30.0	0.0	<input type="checkbox"/>	15	3																																													

S-55-14

12/15/10

Facility: S 55 CHEVRON USA INC LOST HILLS GP	Permit ID: 14	Mod#: 5
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Test Tracking	Periodic Test Setup	Test Equipment Details	Test Result Details																																								
<p>Representative Test</p> <p>Unit Identification: <input type="text" value="K-6"/> Description: <input type="text"/></p> <p>1 Unit Total</p> <p><input type="button" value="Add New Unit"/> <input type="button" value="Save"/> <input type="button" value="Cancel"/></p>																																											
<p>Test Results For: CAHN GP K-6</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units</th> <th>Limit</th> <th>Result</th> <th>Failed</th> <th>O2 Correction (%)</th> <th># Runs</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>CO</td> <td>ppm</td> <td>70.0</td> <td>11.1</td> <td><input type="checkbox"/></td> <td>15</td> <td>3</td> <td></td> </tr> <tr> <td>Fuel S</td> <td>lbs/MMBtu SO2</td> <td>0.00285</td> <td>0.0002</td> <td><input type="checkbox"/></td> <td></td> <td>3</td> <td></td> </tr> <tr> <td>NOx</td> <td>ppm</td> <td>25.0</td> <td>0.01</td> <td><input type="checkbox"/></td> <td>15</td> <td>3</td> <td></td> </tr> <tr> <td>VOC</td> <td>ppm</td> <td>30.0</td> <td>0.0</td> <td><input type="checkbox"/></td> <td>15</td> <td>3</td> <td></td> </tr> </tbody> </table>				Pollutant	Units	Limit	Result	Failed	O2 Correction (%)	# Runs	Description	CO	ppm	70.0	11.1	<input type="checkbox"/>	15	3		Fuel S	lbs/MMBtu SO2	0.00285	0.0002	<input type="checkbox"/>		3		NOx	ppm	25.0	0.01	<input type="checkbox"/>	15	3		VOC	ppm	30.0	0.0	<input type="checkbox"/>	15	3	
Pollutant	Units	Limit	Result	Failed	O2 Correction (%)	# Runs	Description																																				
CO	ppm	70.0	11.1	<input type="checkbox"/>	15	3																																					
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NOx	ppm	25.0	0.01	<input type="checkbox"/>	15	3																																					
VOC	ppm	30.0	0.0	<input type="checkbox"/>	15	3																																					

1/10/13

Facility: S 55 CHEVRON USA INC LOST HILLS GP	Permit ID: 14	Mod#: 6
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Test Tracking	Periodic Test Setup	Test Equipment Details	Test Result Details																																								
<p>Representative Test</p> <p>Unit Identification: <input type="text" value="CAHN GP K-6"/> Description: <input type="text"/></p> <p>1 Unit Total</p> <p><input type="button" value="Add New Unit"/> <input type="button" value="Save"/> <input type="button" value="Cancel"/></p>																																											
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NOx	ppm	25.0	0.22	<input type="checkbox"/>	15	3																																					
VOC	ppm	30.0	0.1	<input type="checkbox"/>	15	3																																					

S-55-14

1/11/13

Facility: 9 55 CHEVRON USA INC LOST HILLS GP	Permit ID: 14	Mod#: 6
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Test Tracking	Periodic Test Setup	Test Equipment Details	Test Result Details																
<p>Representative Test</p> <p>Unit Identification: <input type="text" value="K-6, SUB ZZZZ"/> Description: <input type="text"/></p> <p>1 Unit Total</p> <p><input type="button" value="Add New Unit"/> <input type="button" value="Save"/> <input type="button" value="Cancel"/></p>																			
<p>Test Results For: K-6, SUB ZZZZ</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units</th> <th>Limit</th> <th>Result</th> <th>Failed</th> <th>O2 Correction (%)</th> <th># Runs</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>CO</td> <td>ppm</td> <td>270.0</td> <td>8.0</td> <td><input type="checkbox"/></td> <td>15</td> <td>3</td> <td></td> </tr> </tbody> </table>				Pollutant	Units	Limit	Result	Failed	O2 Correction (%)	# Runs	Description	CO	ppm	270.0	8.0	<input type="checkbox"/>	15	3	
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