



OCT 2 4 2017

Mr. Edward Capehart McKittrick Limited 34759 Lencioni Ave Bakersfield, CA 93308

Re: Notice of Preliminary Decision – Title V Permit Renewal

District Facility # S-1251 Project # S-1162421

Dear Mr. Capehart:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for McKittrick Limited at 4905 Reward Rd, McKittrick, California.

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 and the 45-day EPA comment periods, the District intends to issue the renewed Federally Mandated Operating Permit. 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, please contact Mr. Errol Villegas, Permit Services Manager, at (559) 230-5900.

Sincerely,

Arnaud Marjollet

Director of Permit Services

Enclosures

Tung Le, CARB (w/enclosure) via email CC:

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

Seved Sadredin

Executive Director/Air Pollution Control Officer

SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

Proposed Title V Permit Renewal Evaluation McKittrick Limited S-1251

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TITLE V PERMIT RENEWAL EVALUATION

Cogeneration Power Plant

Engineer: Ramon Norman

Date: October 17, 2017

Facility Number: S-1251

Facility Name: McKittrick Limited
Mailing Address: 34759 Lencioni Ave

Bakersfield, CA 93308

Contact Name: Edward Capehart Email: ecapehart@camsops.com

Responsible Official: Edward Capehart

Title: Plant Manager

Project #: S-1162421

Deemed Complete: June 17, 2016

I. PROPOSAL

McKittrick Limited was issued a Title V permit on September 26, 2000 and the Title V permit was last renewed on March 8, 2012. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the most recent renewal of the Title V permit.

The purpose of this evaluation is to provide the legal and factual basis for all updated applicable requirements and to determine if the facility will comply with these updated requirements. It also specifically identifies all additions, deletions, and/or changes made to permit conditions or equipment descriptions.

II. FACILITY LOCATION

McKittrick Limited is located at 4905 Reward Rd, McKittrick, Kern County, California.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is included as Attachment C.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is requesting to use the following model general permit template:

A. Template SJV-UM-0-3 Facility Wide Umbrella

The applicant has requested to utilize template No. SJV-UM-0-3, <u>Facility Wide Umbrella</u>. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

V. SCOPE OF EPA AND PUBLIC REVIEW

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

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

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

 Conditions 1 through 41 of the draft requirements for the proposed facilitywide permit

VI. FEDERALLY ENFORCEABLE REQUIREMENTS

A. Rules Updated or Evaluated

- District Rule 2020 <u>Exemptions</u> (amended August 18, 2011 (SIP version of the Rule) ⇒ amended December 18, 2014)
- District Rule 2201 New and Modified Stationary Source Review Rule (amended April 21, 2011 (SIP version of the Rule) ⇒ amended February 18, 2016)
- District Rule 2520 <u>Federally Mandated Operating Permits</u> (amended June 21, 2001)
- 40 CFR Part 60, Subpart A <u>General Provisions</u> (Amended June 23, 2017; Section 60.7 Notification and Record Keeping, last amended February 12, 1999; Section 60.8 Performance Tests, amended February 27, 2014 ⇒ last amended August 30, 2016; Section 60.13 Monitoring Requirements, October 6, 1975)
- 40 CFR Part 60, Subpart GG <u>Standards of Performance for Stationary Gas Turbines</u> (Section 60.335 Test Methods and Procedures last updated February 27, 2014)
- 40 CFR Part 60, Subpart TTTT <u>Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units</u> (adopted October 23, 2015) (Applies to units that commence construction after January 8, 2014 or commence modification or reconstruction after June 18, 2014)
- 40 CFR Part 64 Compliance Assurance Monitoring (October 22, 1997)
- 40 CFR Part 82, Subpart B <u>Servicing of Motor Vehicle Air Conditioners</u> (amended August 11, 2011 ⇒ amended June 25, 2013)
- 40 CFR Part 82, Subpart F <u>Recycling and Emissions Reduction</u> (amended November 18, 2016 ⇒ amended December 1, 2016)

B. Rules Removed

No federally enforceable rules were removed.

C. Rules Added

 District Rule 2410 - <u>Prevention of Significant Deterioration</u> (adopted June 16, 2011 and became effective November 26, 2012)

D. Rules Not Updated

- District Rule 1080 Stack Monitoring (amended December 17, 1992)
- District Rule 1081 Source Sampling (amended December 16, 1993)
- District Rule 1100 <u>Equipment Breakdown</u> (amended December 17, 1992)
 (Non SIP replacement for Kern County Rule 111)
- District Rule 1160 Emission Statements (adopted November 18, 1992)
- District Rule 2010 Permits Required (amended December 17, 1992)
- District Rule 2031 <u>Transfer of Permits</u> (amended December 17, 1992)
- District Rule 2070 <u>Standards for Granting Applications</u> (amended December 17, 1992)
- District Rule 2080 Conditional Approval (amended December 17, 1992)
- District Rule 4101 Visible Emissions (amended February 17, 2005)
- District Rule 4601 Architectural Coatings (amended December 17, 2009)
- District Rule 4703 Stationary Gas Turbines (amended September 20, 2007)
- District Rule 4801 <u>Sulfur Compounds</u> (amended December 17, 1992) (Non SIP replacement for Kern County Rule 407)
- District Rule 8011 <u>Fugitive PM10 Control: General Requirements</u> (amended August 19, 2004)
- District Rule 8021 <u>Fugitive PM10 Control: Construction, Demolition, Excavation, and Extraction Activities</u> (amended August 19, 2004)
- District Rule 8031 <u>Fugitive PM10 Control: Handling and Storage of Bulk Materials</u> (amended August 19, 2004)

- District Rule 8041 <u>Fugitive PM10 Control: Carryout and Trackout</u> (amended August 19, 2004)
- District Rule 8051 <u>Fugitive PM10 Control: Open Areas</u> (amended August 19, 2004)
- District Rule 8061 <u>Fugitive PM10 Control: Paved and Unpaved Roads</u> (amended August 19, 2004)
- District Rule 8071 <u>Fugitive PM10 Control: Unpaved Vehicle/Equipment Areas</u> (amended September 16, 2004)
- 40 CFR Part 60, Subpart KKKK <u>Standards of Performance for Stationary</u> <u>Gas Turbines</u> (last amended March 20, 2009)
- 40 CFR Part 61 Subpart M <u>National Emission Standard for Asbestos</u> (last amended July 20, 2004)
- 40 CFR Part 68 <u>Chemical Accident Prevention Provisions</u> (last amended March 13, 2000)
- 40 CFR Part 72, Subpart A <u>Acid Rain Program General Provisions</u> (last amended May 12, 2005) (Facility is exempt pursuant to 40 CFR 72.6(b)(5))

VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

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

For this facility, the following are not federally enforceable and will not be discussed in further detail:

A. Rules Added

No rules that are not federally enforceable were added.

B. Rules Not Updated

District Rule 2040 - <u>Applications</u> (amended December 17, 1992 ⇒ removed from SIP December 16, 2004)

S-1251-0-4: Facility-Wide Requirements

 Condition 7 of the draft facility-wide requirements S-1251-0-4 is based on the rule listed above and is not Federally Enforceable through Title V.

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

S-1251-0-4: Facility-Wide Requirements

 Condition 42 of the draft facility-wide requirements S-1251-0-4 is based on the rule listed above and is not Federally Enforceable through Title V.

S-1251-1-9: 48 MW Cogeneration System with SCR Including Stewart & Stevenson GE LM 5000 Gas-Fired Turbine, Heat Recovery Steam Generator, and Inlet Air Absorption Chiller and Heat Exchanger

• Conditions 15 and 47 of are based on the rule listed above and are not Federally Enforceable through Title V.

VIII. PERMIT REQUIREMENTS

The purpose of this evaluation is to review changes to federally enforceable requirements; therefore, this compliance section will only address rules that have been amended or added since the most recent renewal of the Title V permit.

A. District Rule 2020 - Exemptions

District Rule 2020 lists equipment which is specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions.

District Rule 2020 was last amended on December 18, 2014. The primary purpose of the amendments was the following: clarify alignment of District Rule 2020 with the California Air Resources Board's (ARB) Portable Equipment Registration Program (PERP); to exempt certain oil field tanks with insignificant emissions; and to update standardized testing provisions. Prior to the December 18, 2014 amendments, District Rule 2020 was

previously amended on August 18, 2011. On September 17, 2014, EPA approved the August 18, 2011 version of District Rule 2020 for inclusion into the SIP (79 FR 55637).

The amendments to this rule do not have any effect on current permit requirements and will therefore not be addressed further in this evaluation.

S-1251-0-4: Facility-Wide Requirements

• Condition 4 of the requirements of the proposed facility-wide permit assures compliance with this rule.

B. District Rule 2201 - New and Modified Stationary Source Review Rule

District Rule 2201 applies to new and modified sources that require a District permit. District Rule 2201 has been amended since the most recent renewal of the facility's Title V permit. However, the requirements of this rule are only triggered at the time the source undergoes a modification. This Title V permit renewal does not constitute a modification. Therefore, the updated requirements of this rule are not applicable at this time. All applicable requirements from any NSR permit actions have already been incorporated into the current Title V permit.

C. District Rule 2410 – Prevention of Significant Deterioration (PSD)

District Rule 2410 has been newly adopted since this Title V permit was last renewed. However the requirements of this rule are only triggered at the time the source undergoes a modification. This source has never been subject to this rule, therefore there are no PSD permit applicable requirements to include in the Title V permit.

D. District Rule 2520 - Federally Mandated Operating Permits

The purpose of this rule is to provide an administrative mechanism for the following: issuing operating permits for new and modified sources of air contaminants in accordance with requirements of 40 CFR Part 70; issuing renewed operating permits for sources of air contaminants in accordance with requirements of 40 CFR Part 70; revising, reopening, revoking, and terminating operating permits for sources of air contaminants in accordance with requirements of 40 CFR Part 70; incorporating requirements authorized by preconstruction permits issued under District Rule 2201 (New and Modified Stationary Source Review) in a Part 70 permit as administrative amendments, provided that such permits meet the necessary procedural and compliance requirements.

District Rule 2520 has not been amended since this facility's Title V permit was last renewed; however, greenhouse gas emissions will be addressed under Rule 2520 during this renewal.

Greenhouse Gas Requirements

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

E. 40 CFR Part 60, Subpart A - General Provisions

The provisions of 40 CFR Part 60, Subpart A are applicable to the owner or operator of any stationary source which contains an affected facility, the construction or modification of which is commenced after the date of publication in this part of any standard (or, if earlier, the date of publication of any proposed standard) applicable to that facility, except as provided in Subparts B and C. 40 CFR Part 60.2 – Definitions states, "Affected facility means, with reference to a stationary source, any apparatus to which a standard is applicable."

The requirements of Permit Unit S-1251-1 include conditions that reference the following sections of 40 CFR Part 60, Subpart A: Section 60.7 - Notification and Record Keeping, Section 60.8 - Performance Tests, Section 60.13 – Monitoring Requirements.

Section 60.7 of 40 CFR Part 60, Subpart A was last amended on February 12, 1999 and Section 60.13 of 40 CFR Part 60, Subpart A was adopted on October 6, 1975 and has not been amended. Sections 60.7 and 60.13 have not been amended since the issuance of the facility's initial Title V permit or the most recent renewal of the Title V permit; therefore continued compliance with the applicable requirements of these sections is expected.

Section 60.8 of 40 CFR Part 60, Subpart A was last amended on August 30, 2016, which is after the date of the most recent renewal of the facility's Title V permit. However, the only reference to Section 60.8 was Condition 50 of the requirements of Permit Unit S-1251-1, which granted a permit shield from Section 60.8. As discussed in Section IX below, this shield has been removed from the proposed requirements for this unit and compliance is expected.

S-1251-1-9: 48 MW Cogeneration System with SCR Including Stewart & Stevenson GE LM 5000 Gas-Fired Turbine, Heat Recovery Steam Generator, and Inlet Air Absorption Chiller and Heat Exchanger

• Conditions 32 and 45 of the proposed requirements for this permit unit assure compliance with the applicable requirements of this regulation.

F. 40 CFR Part 60, Subpart GG - <u>Standards of Performance for</u> Stationary Gas Turbines

The provisions of 40 CFR Part 60, Subpart GG are applicable to all stationary gas turbines with a heat input at peak load equal to or greater than 10.7 gigajoules (10 million Btu) per hour, based on the lower heating value of the fuel fired, which commences construction, modification, or reconstruction after October 3, 1977, except as provided in paragraphs (e) and (j) of Section 60.332. 40 CFR Part 60, Subpart GG establishes emission standards for nitrogen oxides and sulfur dioxide from stationary gas turbines.

The only amendments to 40 CFR Part 60, Subpart GG since this facility's Title V permit was last renewed in 2012 were to Section 60.335 Test Methods and Procedures. On February 27, 2014, the definitions of terms for the equation in 40 CFR Part 60, Subpart GG, Section 60.335(b)(1) were revised to allow the reference combustor inlet absolute pressure to be measured in millimeters of mercury (mm Hg). The site barometric pressure is allowed as an alternative to the observed combustor inlet absolute pressure for calculating the mean NOx emission concentration (see: https://www.gpo.gov/fdsys/pkg/FR-2014-02-27/html/2014-02704.htm).

The amendments to this subpart to allow the reference combustor inlet absolute pressure to be measured in millimeters of mercury (mm Hg) do not have any effect on the current permit requirements and therefore will not be addressed further in this evaluation.

S-1251-1-9: 48 MW Cogeneration System with SCR Including Stewart & Stevenson GE LM 5000 Gas-Fired Turbine, Heat Recovery Steam Generator, and Inlet Air Absorption Chiller and Heat Exchanger

• Conditions 21, 28-30, 33-34, and 39-40 of the proposed requirements for this permit unit assure compliance with the applicable requirements.

G. 40 CFR Part 60, Subpart TTTT - <u>Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units</u>

40 CFR Part 60, Subpart TTTT establishes emission standards and compliance schedules for the control of greenhouse gas (GHG) emissions from a steam generating unit, Integrated Gasification Combined Cycle facility (IGCC), or a stationary combustion turbine that commences construction after January 8, 2014 or commences modification or reconstruction after June 18, 2014.

Pursuant to Section 60.5509, except as provided for in Section 60.5509, paragraph (b), the GHG standards included in this subpart apply to any steam generating unit, IGCC, or stationary combustion turbine that commenced construction after January 8, 2014 or commenced reconstruction after June 18, 2014 that meets the relevant applicability conditions in Section 60.5509, paragraphs (a)(1) and (a)(2). The GHG standards included in this subpart also apply to any steam generating unit or IGCC that commenced modification after June 18, 2014 that meets the relevant applicability conditions in Section 60.5509, paragraphs (a)(1) and (a)(2).

The 48 MW cogeneration system with a gas-fired turbine at this facility (Unit S-1251-1) is an existing unit that has not commenced construction, as defined in 40 CFR 60, subpart A, after January 8, 2014 and has not commenced reconstruction, as defined in 40 CFR 60, subpart A, after June 18, 2014. Therefore, the requirements of this subpart are not applicable.

H. 40 CFR Part 64 - Compliance Assurance Monitoring (CAM)

40 CFR Part 64 requires Compliance Assurance Monitoring for units that meet the following three criteria:

- 1) the unit must have an emission limit for the pollutant;
- the unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
- 3) the unit must have a pre-control potential to emit of greater than the major source thresholds.

Pollutant	Major Source Threshold (lb/year)				
NO _X	20,000				
SO _X	140,000				
PM ₁₀	140,000				
CO	200,000				
VOC	20,000				

S-1251-1-9: 48 MW Cogeneration System with SCR Including Stewart & Stevenson GE LM 5000 Gas-Fired Turbine, Heat Recovery Steam Generator, and Inlet Air Absorption Chiller and Heat Exchanger

The 48 MW cogeneration system has emission limits for NO_x, SO_x, PM₁₀, CO, and VOC. The unit is equipped with steam injection and selective catalytic reduction (SCR) to control NO_x and an oxidation catalyst to control CO and VOC; therefore, the unit is potentially subject to CAM for these pollutants. This unit is not equipped with any add-on controls for SO_x or PM; therefore, CAM is not required for SO_x or PM₁₀. The pre-control potential to emit for NO_x, CO, and VOC from this permit unit is calculated below using emission factors from EPA AP-42, 3.1 Stationary Gas Turbines (4/2000).

NO_X

Pre-Control Emission Factor: 0.32 lb-NOx/MMBtu (Source: EPA AP-42, 3.1 Stationary Gas Turbines (4/2000), Table 3.1-1)

Maximum Heat Input: 457.8 MMBtu/hr (Source: Current Permit)

Pre-Control Potential to Emit: 0.32 lb-NOx/MMBtu x 457.8 MMBtu/hr x 24 hr/day x 365 day/yr = 1,283,305 lb-NOx/yr

CO

Pre-Control Emission Factor: 0.082 lb-CO/MMBtu (Source: EPA AP-42, 3.1 Stationary Gas Turbines (4/2000), Table 3.1-1)

Maximum Heat Input: 457.8 MMBtu/hr (Source: Current Permit)

Pre-Control Potential to Emit: 0.082 lb-CO/MMBtu \times 457.8 MMBtu/hr \times 24 hr/day \times 365 day/yr = 328,847 lb-CO/yr

VOC

Pre-Control Emission Factor: 0.0021 lb-VOC/MMBtu (Source: EPA AP-42, 3.1 Stationary Gas Turbines (4/2000), Table 3.1-2a)

Maximum Heat Input: 457.8 MMBtu/hr (Source: Current Permit)

Pre-Control Potential to Emit: $0.0021 \text{ lb-VOC/MMBtu} \times 457.8 \text{ MMBtu/hr} \times 24 \text{ hr/day} \times 365 \text{ day/yr} = 8,422 \text{ lb-VOC/yr}$

As shown above, the pre-control potential to emit for NO_X and CO from this permit unit exceeds the applicable major source thresholds for these pollutants. Therefore, CAM is potentially required for this permit unit for these pollutants. However, 40 CFR 64.2 Applicability, Paragraph (b) exemptions, states:

(b) Exemptions—(1) Exempt emission limitations or standards. The requirements of this part shall not apply to any of the following emission limitations or standards:

(vi) Emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method, as defined in §64.1. The exemption provided in this paragraph (b)(1)(vi) shall not apply if the applicable compliance method includes an assumed control device emission reduction factor that could be affected by the actual operation and maintenance of the control device (such as a surface coating line controlled by an incinerator for which continuous compliance is determined by calculating emissions on the basis of coating records and an assumed control device efficiency factor based on an initial performance test; in this example, this part would apply to the control device and capture system, but not to the remaining elements of the coating line, such as raw material usage).

This 48 MW cogeneration system is equipped with continuous emissions monitoring systems (CEMS) for NO_x and CO and the conditions of the facility's Title V permit require that the unit be equipped with monitors that continuously record NO_x, CO, and O₂ concentrations in exhaust stack and a CEMS that continuously measures and records the exhaust gas NO_x and O₂ concentrations. Therefore, this unit is exempt from CAM for NO_x and CO.

• Conditions 3 and 28-33 of the proposed requirements for this permit unit assure compliance.

I. 40 CFR Part 82, Subpart B - Stratospheric Ozone

The purpose of 40 CFR Part 82 Subpart B is to implement section 609 of the Clean Air Act, as amended regarding the servicing of motor vehicle air conditioners (MVACs), and to implement section 608 of the Clean Air Act regarding certain servicing, maintenance, repair and disposal of air conditioners in MVACs and MVAC-like appliances.

These regulations apply to any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner.

The amendments to this subpart do not have any effect on the current permit requirements and therefore will not be addressed further in this evaluation.

S-1251-0-4: Facility-Wide Requirements

• Condition 28 of the requirements of the proposed facility-wide permit assures compliance.

J. 40 CFR Part 82, Subpart F - Stratospheric Ozone

The purpose of 40 CFR Part 82 Subpart F is to reduce emissions of class I and class II refrigerants and their substitutes to the lowest achievable level by maximizing the recapture and recycling of such refrigerants during the service, maintenance, repair, and disposal of appliances and restricting the sale of refrigerants consisting in whole or in part of a class I and class II ODS in accordance with Title VI of the Clean Air Act.

These regulations apply to any person servicing, maintaining, or repairing appliances. This subpart also applies to persons disposing of appliances, including small appliances and motor vehicle air conditioners. In addition, this subpart applies to refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturer of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons selling class I or class II refrigerants or offering class I or class II refrigerants for sale, and persons purchasing class I or class II refrigerants.

The amendments to this subpart do not have any effect on the current permit requirements and therefore will not be addressed further in this evaluation.

S-1251-0-4: Facility-Wide Requirements

• Condition 27 of the requirements of the proposed facility-wide permit assures compliance.

IX. PERMIT SHIELD

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

A. Requirements Addressed by Model General Permit Templates

Model General Permit Template SJV-UM-0-3

By submitting Model General Permit Template SJV-UM-0-3 qualification form, the applicant has requested that a permit shield be granted for all the applicable requirements identified by the template. Therefore, the permit shields as granted in Model General Permit Template are included as conditions 39 and 40 of the proposed facility-wide requirements (S-1251-0-4).

B. Requirements not Addressed by Model General Permit Templates

The applicant has not requested any permit shields.

C. Obsolete Permit Shields From Existing Permit Requirements

Obsolete permit shields for existing permit units have been removed because the referenced rules have been superseded by the adoption of newer rules or amendments to existing rules and/or the referenced rules have been removed from the SIP.

S-1251-0-4: Facility-Wide Requirements

Condition 39 of the previous requirements of the facility-wide permit granted a permit shield from Fresno County Rule 401, Kern County Rule 401, Kings County Rule 401, Madera County Rule 401, Merced County Rule 401, San Joaquin County Rule 401, Stanislaus County Rule 401, and Tulare County Rule 401. This permit shield was from the model

general permit template. The facility is located in Kern County so only the Kern County Rule would apply. District Rule 4101 (as amended 2/17/2005) has replaced these rules, including Kern County Rule 401, in the SIP. Therefore, the permit shield for these rules has been removed.

Condition 39 of the previous requirements of the facility-wide permit granted a permit shield from Fresno County Rule 110, Kern County Rule 111, Kings County Rule 111, Madera County Rule 113, Merced County Rule 109, San Joaquin County Rule 110, Stanislaus County Rule 110, and Tulare County Rule 111. This permit shield was from the model general permit template. The facility is located in Kern County so only the Kern County Rule would apply. Therefore, the references to other county rules have been removed from the permit shield.

Condition 39 of the previous requirements of the facility-wide permit granted a permit shield from Fresno County Rule 202, Kern County Rule 202, Kings County Rule 202, Madera County Rule 202, Merced County Rule 202, San Joaquin County Rule 202, Stanislaus County Rule 202, and Tulare County Rule 202. This permit shield was from the model general permit template. The facility is located in Kern County so only the Kern County Rule would apply. District Rule 2020 (as amended 8/18/2011) has replaced these rules, including Kern County Rule 202, in the SIP. Therefore, the permit shield for these rules has been removed.

Condition 40 of the previous requirements of the facility-wide permit granted a permit shield from District Rule 2040 as amended 12/17/1992. Because this rule is not an applicable requirement included in the SIP, the permit shield is invalid and has been removed.

S-1251-1-9: 48 MW Cogeneration System with SCR Including Stewart & Stevenson GE LM 5000 Gas-Fired Turbine, Heat Recovery Steam Generator, and Inlet Air Absorption Chiller and Heat Exchanger

Condition 48 of the previous requirements for this permit unit granted a permit shield from Fresno County Rule 406, Kern County Rule 407, Kings County Rule 407, Madera County Rule 404, Merced County Rule 407, San Joaquin County Rule 407, Stanislaus County Rule 407, and Tulare County Rule 407. This permit shield was from a previous model general permit template. The facility is located in Kern County so only the Kern County Rule would apply. Therefore, the references to other county rules have been removed from the permit shield.

Condition 50 of the previous requirements for this permit unit granted a permit shield from 40 CFR 60, Section 60.8. As discussed above, Section

60.8 of 40 CFR Part 60, Subpart A has been amended since the date of the most recent renewal of the facility's Title V permit. Therefore, this permit shield is no longer valid and has been removed.

X. CALIFORNIA ENVIRONMENTAL QUALITY ACT

The purpose of the Title V permit renewal is to update the permit to ensure that any changes to regulations since the issuance of the initial Title V permit or most recent renewal of the Title V permit are incorporated as permit requirements.

Per the California Environmental Quality Act (CEQA) Statute §21080.24, and CEQA Guidelines §15281, the issuance, modification, amendment, or renewal of any permit by an air pollution control district or air quality management district pursuant to Title V is exempt from CEQA, unless the issuance, modification, amendment, or renewal authorizes a physical or operational change to a source or facility. There will be no physical or operational change to the source or facility nor will the Title V permit renewal authorize a physical or operational change to the source or facility. Therefore, this project, a Title V permit renewal, is subject to a ministerial action that is exempt from CEQA.

XI. PERMIT CONDITIONS

See Attachment A - Draft Renewed Title V Operating Permit.

ATTACHMENTS

- A. Draft Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Detailed Summary List of Facility Permits

ATTACHMENT A

Draft Renewed Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: S-1251-0-4

EXPIRATION

FACILITY-WIDE REQUIREMENTS

- The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; Kern County Rule 111] Federally Enforceable Through Title V Permit
- The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; Kern County Rule 111] Federally Enforceable Through Title V Permit
- {4364} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
- Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (8/18/2011). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
- {4366} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.13.1] Federally Enforceable Through Title V Permit
- {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
- Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040]
- {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
- {4370} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.42] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Remail to Operate. Any amendments to these Facility-Any amendments to these Facility-wide Requirements that affect specific

Permit Units may constitute modification of those Permit Units. Facility Name: MCKITTRICK LIMITED

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

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- 22. {4383} No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
- 23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 2 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
- 24. {4385} All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
- 25. {4386} The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
- 26. {4387} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
- 27. {4388} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
- 28. {4389} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
- 29. {4390} Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8021] Federally Enforceable Through Title V Permit
- 30. {4391} Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004), [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit
- 31. {4392} An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004), [District Rules 8011 and 8041] Federally Enforceable Through Title V Permit
- 32. {4393} Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8051] Federally Enforceable Through Title V Permit
- 33. {4394} Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8061] Federally Enforceable Through Title V Permit
- 34. {4395} Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 801 Land 8071] Federally Enforceable Through Title V Permit FACILITY WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

- 35. {4396} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
- 36. {4397} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
- 37. {4398} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
- 38. {4399} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
- 39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Kern County Rule 111. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 41. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
- 42. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 43. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1251-1-9

SECTION: NE13 TOWNSHIP: 30S RANGE: 21E

EQUIPMENT DESCRIPTION:

48 MW COGENERATION SYSTEM WITH SCR INCLUDING STEWART & STEVENSON GE LM 5000 GAS-FIRED TURBINE, HEAT RECOVERY STEAM GENERATOR, AND INLET AIR ABSORPTION CHILLER AND HEAT **EXCHANGER**

PERMIT UNIT REQUIREMENTS

- Maximum heat input rating of General Electric LM 5000 gas-fired turbine engine shall not exceed 457.8 MM Btu/hr, and turbine shall be equipped with combustor steam injection and selective catalytic reduction, utilizing ammonia, for NOx control. [District Rule 2201] Federally Enforceable Through Title V Permit
- Turbine engine combustor steam injection system shall be equipped with continuously recording steam to fuel injection rate monitoring system accurate to within +/- 5%. [District Rule 2201] Federally Enforceable Through Title V Permit
- Unfired heat recovery steam generator shall not be designed for supplementary firing, and shall be equipped with continuously recording NOx emissions monitor located ahead of SCR catalyst and continuously recording NOx, CO and O2 monitors in exhaust stack. [District Rule 2201] Federally Enforceable Through Title V Permit
- Turbine engine shall be equipped with carbon monoxide reactor of sufficient catalyst volume to meet CO and VOC emissions limits. [District Rule 2201] Federally Enforceable Through Title V Permit
- Turbine lube oil reservoir shall be equipped with mist collectors with return line to the turbine lube oil reservoir. [District Rule 2201] Federally Enforceable Through Title V Permit
- Turbine air/oil separator shall be equipped with pre-separator, heat exchanger and air/oil final separator with return lines to turbine lube oil reservoir. [District Rule 2201] Federally Enforceable Through Title V Permit
- Generator lube oil reservoir shall be equipped with mist collector with return piping to generator lube oil reservoir. [District Rule 2201] Federally Enforceable Through Title V Permit
- Turbine shall be equipped with continuously recording fuel gas flowmeter and turbine shall utilize only natural gas a fuel. [District Rule 2201] Federally Enforceable Through Title V Permit
- Circular cross section exhaust stack (after SCR unit) shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and equipped with flow straightener, if necessary, to minimize turbulence. [District Rule 1081] Federally Enforceable Through Title V Permit
- 10. Ammonia injection grid shall be equipped with operational ammonia flowmeter and injection pressure indicator, and exhaust gas temperature at SCR catalyst inlet shall be monitored by operational temperature indicator. [District Rule 22011 Federally Enforceable Through Title V Permit
- 11. Turbine engine steam injection rate shall be maintained at a steam to fuel ratio expected to result in compliance with emissions limits, except during periods of startup and shutdown. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. All gas turbine engine exhaust shall flow through catalyst beat [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.

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- 13. Inlet gas temperature to catalyst bed shall be maintained within the range recommended by manufacturer except during periods of startup and shutdown. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. McKittrick Limited shall monitor and record exhaust gas temperature at oxidation catalyst inlet. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. Ammonia injection rate shall be controlled to maintain ammonia slip of less than 20 ppmv. [District Rule 4102]
- Fuel gas sulfur content shall not exceed 0.25 gr H2S/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. Steam produced at this facility for use in oil production operations shall affect only wells connected to well vent vapor recovery systems approved by District. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. Maximum VOC emission concentration (as CH4) at turbine exhaust shall not exceed 5.33 ppmv dry at 15% O2, except during periods of startup and shutdown. (BACT requirement, only if catalyst inlet temperature exceeds 800 deg F). [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. VOC emissions, including emissions from turbine and generator lube oil vents, shall not exceed 5.5 lbs/hr, except during periods of startup and shutdown. [District Rule 2201] Federally Enforceable Through Title V Permit
- Emissions rate from turbine exhaust shall not exceed any of the following limits: 51.9 lbs PM10/day, 7.0 lbs SOx (as SO2)/day, 147.9 lbs NOx/day, 264 lbs CO/day, or 130.8 lbs VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 21. Emission concentration of oxides of nitrogen (as NO2) at turbine exhaust shall not exceed 3.75 ppmv dry calculated to 15% O2 averaged over a three hour period, except during periods of startup or shutdown. [District Rules 2201 and 4703, 5.1, and 40 CFR 60.332(a)(1) & 60.332(a)(2)] Federally Enforceable Through Title V Permit
- 22. Emissions concentration of carbon monoxide at turbine exhaust shall not exceed 11 ppmv calculated to 15% O2 averaged over a three hour period, except during periods of startup or shutdown. [District Rules 2201 and 4703, 5.1] Federally Enforceable Through Title V Permit
- 23. Compliance with NOx (ppmv), CO (ppmv), VOC (ppmv), turbine exhaust VOC (hourly), ammonia (ppmv) emissions limits, and lube oil cooler/accumulating vent opacity shall be demonstrated by District witnessed sample collection and observation annually. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
- 24. Compliance with fuel gas sulfur content shall be demonstrated by fuel gas sample analysis at time of annual stack gas sampling. [District Rule 2201] Federally Enforceable Through Title V Permit
- 25. Any lube oil cooler/accumulating vent having visible emissions with an opacity of 5% or greater shall be tested to demonstrate compliance with VOC hourly emissions limit. Official test results/field data shall be submitted within 60 days of testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 26. A written record of the compliance demonstrations shall be maintained and made available for District inspection for a period of five years. [District Rules 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 27. McKittrick Limited shall keep accurate records of daily fuel consumption of gas turbine engine and shall make records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
- 28. The owner or operator shall certify, maintain, operate, and quality-assure a Continuous Emission Monitoring System (CEMS) which continuously measures and records the exhaust gas NOx and O2 concentrations. [District Rule 4703, 6.2.1 and 40 CFR 60.334(b)] Federally Enforceable Through Title V Permit
- 29. The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period or shall meet equivalent specifications established by mutual agreement of the District, the ARB and the EPA. [District Rule 1080, 6.4 and 40 CFR 60.334(b)(2)] Federally Enforceable Through Title V Permit

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- 30. The NOx and O2 CEMS shall meet the requirements in 40 CFR 60, Appendix B Performance Specifications 2 and 3 and 40 CFR 60, Appendix F Procedure 1, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [District Rules 1080, 6.3, 6.5, 6.6, & 7.2 and 4703, and 40 CFR 60.334(b)(1)] Federally Enforceable Through Title V Permit
- 31. The CEMS shall be linked to a data logger which is compatible with the District's Data acquisition system. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080, 7.1] Federally Enforceable Through Title V **Permit**
- 32. The owner or operator shall maintain CEMS records that contain the following: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, maintenance, duration of any periods during which a continuous monitoring system or monitoring device is inoperative, and emission measurements. [District Rule 1080, 7.3 and 40 CFR 60.7(b)] Federally Enforceable Through Title V Permit
- 33. The owner or operator shall submit a written report of CEM operations for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess NOx emissions, nature and the cause of excess (if known), corrective actions taken and preventive measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; Applicable time and date of each period during which the CEM was inoperative (monitor downtime), except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred. [District Rule 1080, 8.0 and 40 CFR 60.334(j), (j)(5)] Federally Enforceable Through Title V Permit
- 34. Excess emissions shall be defined as any operating hour in which 4-hour rolling average NOx concentration exceeds applicable emissions limit and a period of monitor downtime shall be any unit operating hour in which sufficient data are not obtained to validate the hour for either NOx or O2 (or both). [40 CFR 60.334(j)(1)(iii)] Federally Enforceable Through Title V Permit
- 35. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the monitoring devices required by this rule to ensure that such devices are functioning properly. [District Rule 1080, 11.0] Federally Enforceable Through Title V Permit
- 36. {2264} Reduced Load Period shall be defined as the time during which a gas turbine is operated at less than rated capacity in order to change the exhaust gas diverter gate not exceeding one hour. [District Rule 4703, 3.19] Federally Enforceable Through Title V Permit
- 37. {2265} Thermal Stabilization Period shall be defined as the start up or shut down time during which the exhaust gas is not within the normal operating range, not to exceed two hours. [District Rule 4703, 3.25] Federally Enforceable Through Title V Permit
- 38. {2256} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
- 39. The sulfur content of each fuel source shall be: (i) documented in a valid purchase contract, a supplier certification, a tariff sheet or transportation contract or (ii) monitored weekly using ASTM Methods D4084, D5504, D6228, or Gas Processors Association Standard 2377. If H2S content is less than 0.25 gr/100 scf for 8 consecutive weeks, then the Monitoring frequency shall be every six (6) months. If any six (6) month monitoring show an exceedance, weekly monitoring shall resume. [District Rule 2520, 9.3.2 and 40 CFR 60.334(h)(3)] Federally Enforceable Through Title V Permit
- 40. Performance testing shall be conducted annually to measure NOx and CO emission concentrations using the following test methods: EPA Methods 7E or 20 for NOx emissions, EPA Methods 10 or 10B for CO emissions, EPA Methods 3, 3A, or 20 for Oxygen content of the exhaust gas. The 9-run tests shall be performed at between 90 and 100 percent of peak load (or the highest physically achievable load) of the gas turbine. [District Rule 4703, 6.3.1, 6.4.1, 6.4.2, & 6.4.3 and 40 CFR 60.335(a), (b)(7)] Federally Enforceable Through Title V Permit

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- 41. The owner or operator shall be required to conform to the sampling facilities and testing procedures described in District Rule 1081, 3.0, & 6.0 (as amended 12/16/93). [District Rule 1081, 3.0 & 6.0] Federally Enforceable Through Title V Permit
- 42. The District must be notified 30 days prior to any performance testing and a test plan shall be submitted for District approval 15 days prior to such testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
- 43. Performance testing shall be witnessed or authorized District personnel. Test results must be submitted to the District within 60 days of performance testing. [District Rule 1081, 7.2, 7.3] Federally Enforceable Through Title V Permit
- 44. The owner or operator of a stationary gas turbine system shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rules 2520, 9.4.2 and 4703, 6.2.4] Federally Enforceable Through Title V Permit
- 45. Results of the CEM system shall be averaged over a three hour period, using consecutive 15-minute sampling periods in accordance with all applicable requirements of CFR 60.13, [District Rule 4703, 5.1, 6.4 and 40 CFR 60.13] Federally Enforceable Through Title V Permit
- 46. Owner or operator shall maintain a stationary gas turbine system operating log that includes, on a daily basis, the actual local time start-up and stop time, length and reason for reduced load periods, total hours of operation, type and quantity of fuel used. [District Rule 4703, 6.2.6] Federally Enforceable Through Title V Permit
- 47. Compliance with the ammonia slip (ppmv) emission limits shall be demonstrated by sample collection taken by independent testing laboratory annually within 60 days prior to permit anniversary date. The District shall be notified prior to the completion of any sampling event. Official test results and field data collection shall be submitted to the District within 60 days of testing. [District Rule 4102]
- 48. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements; Kern County Rule 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 49. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.332 (a)(1), (a)(2), 60.333 (b); 60.334(b) (b)(1), (b)(2), (h)(3), (j), (j)(1)(iii), and (j)(5), and 60.335(a), (b)(7), (b)(3), and District Rule 4703 (as amended 9/20/07), Sections 5.1.2.1, 5.2, 6.2.2, 6.2.6, 6.3, and 6.4. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V **Permit**
- 50. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.7(b) and 60.13, and District Rules 1080 (as amended 12/17/92), Sections 6.3, 6.4, 6.5, 6.6, 7.1, 7.2, 7.3, 8.0, and 11.0: 1081(as amended 12/16/93), Sections 3.0, 6.0, 7.1, 7.2, and 7.3; and 4201 (as amended 12/17/92). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

Facility-wide Permit to Operate. These terms and condition

Facility Name: MCKITTRICK LIMITED ocation: HEAVY OIL WESTERN, 4905 REWARD RD, MOKE

ATTACHMENT B

Previous Title V Operating Permit





Permit to Operate

FACILITY: S-1251 EXPIRATION DATE: 03/31/2017

LEGAL OWNER OR OPERATOR:

MAILING ADDRESS:

MCKITTRICK LIMITED 34759 LENCIONI AVE

BAKERSFIELD, CA 93308

FACILITY LOCATION: HEAVY OIL WESTERN

4905 REWARD RD MCKITTRICK, CA 93251

FACILITY DESCRIPTION: COGENERATION

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

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

Seyed Sadredin
Executive Director / APCO

Arnaud Marjollet
Director of Permit Services

San Joaquin Valley Air Pollution Control District

FACILITY: S-1251-0-3 **EXPIRATION DATE: 03/31/2017**

FACILITY-WIDE REQUIREMENTS

- The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
- The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
- The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
- Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
- The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.13.1] Federally Enforceable Through Title V Permit
- A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District, [District Rule 2031] Federally Enforceable Through Title V Permit
- Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
- The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
- The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

- 10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
- 11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
- 12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
- 13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
- 14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
- 15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
- 16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
- 17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
- 18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
- 19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
- 20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
- 21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
- 22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

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

- 23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
- 24. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
- 25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
- 26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
- 27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
- 28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
- 29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8021] Federally Enforceable Through Title V Permit
- 30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit
- 31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8041] Federally Enforceable Through Title V Permit
- 32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8051] Federally Enforceable Through Title V Permit
- 33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8061] Federally Enforceable Through Title V Permit
- 34. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8071] Federally Enforceable Through Title V Permit
- 35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

- 36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits. including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
- 37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
- 38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
- 39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V **Permit**
- 41. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 42. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
- 43. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1251-1-11 EXPIRATION DATE: 03/31/2017

SECTION: NE13 TOWNSHIP: 30S RANGE: 21E

EQUIPMENT DESCRIPTION:

48 MW COGENERATION SYSTEM WITH SCR INCLUDING STEWART & STEVENSON GE LM 5000 GAS-FIRED TURBINE, HEAT RECOVERY STEAM GENERATOR, AND INLET AIR ABSORPTION CHILLER AND HEAT **EXCHANGER**

PERMIT UNIT REQUIREMENTS

- Maximum heat input rating of General Electric LM 5000 gas-fired turbine engine shall not exceed 457.8 MM Btu/hr, and turbine shall be equipped with combustor steam injection and selective catalytic reduction, utilizing ammonia, for NOx control. [District NSR Rule] Federally Enforceable Through Title V Permit
- Turbine engine combustor steam injection system shall be equipped with continuously recording steam to fuel injection rate monitoring system accurate to within +/- 5%. [District NSR Rule] Federally Enforceable Through Title V Permit
- Unfired heat recovery steam generator shall not be designed for supplementary firing, and shall be equipped with continuously recording NOx emissions monitor located ahead of SCR catalyst and continuously recording NOx, CO and O2 monitors in exhaust stack. [District NSR Rule] Federally Enforceable Through Title V Permit
- Turbine engine shall be equipped with carbon monoxide reactor of sufficient catalyst volume to meet CO and VOC emissions limits. [District NSR Rule] Federally Enforceable Through Title V Permit
- Turbine lube oil reservoir shall be equipped with mist collectors with return line to the turbine lube oil reservoir. [District NSR Rule] Federally Enforceable Through Title V Permit
- Turbine air/oil separator shall be equipped with pre-separator, heat exchanger and air/oil final separator with return lines to turbine lube oil reservoir. [District NSR Rule] Federally Enforceable Through Title V Permit
- Generator lube oil reservoir shall be equipped with mist collector with return piping to generator lube oil reservoir. [District NSR Rule] Federally Enforceable Through Title V Permit
- Turbine shall be equipped with continuously recording fuel gas flowmeter and turbine shall utilize only natural gas a fuel. [District NSR Rule] Federally Enforceable Through Title V Permit
- Circular cross section exhaust stack (after SCR unit) shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and equipped with flow straightener, if necessary, to minimize turbulence. [District Rule 1081] Federally Enforceable Through Title V Permit
- 10. Ammonia injection grid shall be equipped with operational ammonia flowmeter and injection pressure indicator, and exhaust gas temperature at SCR catalyst inlet shall be monitored by operational temperature indicator. [District NSR Rule] Federally Enforceable Through Title V Permit
- 11. Turbine engine steam injection rate shall be maintained at a steam to fuel ratio expected to result in compliance with emissions limits, except during periods of startup and shutdown. [District NSR Rule] Federally Enforceable Through Title V Permit
- 12. All gas turbine engine exhaust shall flow through catalyst bed. [District NSR Rule] 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.

Facility Name: MCKITTRICK LIMITED Location: HEAVY OIL WESTERN, 4905 REWARD RD, MCKITTRICK, CA 93251 S-1251-1-11: Sep 21 2017 11-29AM - NORMANR

- 13. Inlet gas temperature to catalyst bed shall be maintained within the range recommended by manufacturer except during periods of startup and shutdown. [District NSR Rule] Federally Enforceable Through Title V Permit
- 14. McKittrick Limited shall monitor and record exhaust gas temperature at oxidation catalyst inlet. [District NSR Rule] Federally Enforceable Through Title V Permit
- 15. Ammonia injection rate shall be controlled to maintain ammonia slip to less than 20 ppmv. [District Rule 4102]
- 16. Fuel gas sulfur content shall not exceed 0.25 gr H2S/100 scf. [District NSR Rule] Federally Enforceable Through Title V Permit
- 17. Steam produced at this facility for use in oil production operations shall affect only wells connected to well vent vapor recovery systems approved by District. [District NSR Rule] Federally Enforceable Through Title V Permit
- 18. Maximum VOC emission concentration (as CH4) at turbine exhaust shall not exceed 5.33 ppmv dry at 15% O2, except during periods of startup and shutdown. (BACT requirement, only if catalyst inlet temperature exceeds 800 deg F). [District NSR Rule] Federally Enforceable Through Title V Permit
- 19. VOC emissions, including emissions from turbine and generator lube oil vents, shall not exceed 5.5 lbs/hr, except during periods of startup and shutdown. [District NSR Rule] Federally Enforceable Through Title V Permit
- 20. Emissions rate from turbine exhaust shall not exceed: 51.9 lbs PM10/day, 7.0 lbs SOx (as SO2)/day, 147.9 lbs NOx/day, 264 lbs CO/day and 130.8 lbs VOC/day. [District NSR Rule] Federally Enforceable Through Title V Permit
- 21. Emission concentration of oxides of nitrogen (as NO2) at turbine exhaust shall not exceed 3.75 ppmv dry calculated to 15% O2 averaged over a three hour period, except during periods of startup or shutdown. [District NSR Rule, 4703, 5.1, and 40 CFR 60.332(a)(1) & 60.332(a)(2)] Federally Enforceable Through Title V Permit
- 22. Emissions concentration of carbon monoxide at turbine exhaust shall not exceed 11 ppmv calculated to 15% O2 averaged over a three hour period, except during periods of startup or shutdown. [District NSR Rule, and 4703, 5.1] Federally Enforceable Through Title V Permit
- 23. Compliance with NOx (ppmv), CO (ppmv), VOC (ppmv), turbine exhaust VOC (hourly), ammonia (ppmv) emissions limits, and lube oil cooler/accumulating vent opacity shall be demonstrated by District witnessed sample collection and observation annually. [District NSR Rule and 4703] Federally Enforceable Through Title V Permit
- 24. Compliance with fuel gas sulfur content shall be demonstrated by fuel gas sample analysis at time of annual stack gas sampling. [District NSR Rule] Federally Enforceable Through Title V Permit
- 25. Any lube oil cooler/accumulating vent having visible emissions with an opacity of 5% or greater shall be tested to demonstrate compliance with VOC hourly emissions limit. Official test results/field data shall be submitted within 60 days of testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 26. A written record of the compliance demonstrations shall be maintained and made available for District inspection for a period of five years. [District NSR Rule and 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 27. McKittrick Limited shall keep accurate records of daily fuel consumption of gas turbine engine and shall make records readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
- 28. The owner or operator shall install, certify, maintain, operate and quality-assure a Continuous Emission Monitoring System (CEMS) which continuously measures and records the exhaust gas NOx and O2 concentrations. [40 CFR 60.334(b) and District Rule 4703, 6.2.1] Federally Enforceable Through Title V Permit
- 29. The CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period or shall meet equivalent specifications established by mutual agreement of the District, the ARB and the EPA. [40 CFR 60.334(b)(2) and District Rule 1080, 6.4] Federally Enforceable Through Title V Permit

Location: HEAVY OIL WESTERN,4905 REWARD RD,MCKITTRICK, CA 93251 \$-1251-1-11: Sep 21 2017 11:284M - NORMANR

- 30. The NOx and O2 CEMS shall meet the requirements in 40 CFR 60, Appendix F Procedure 1 and Part 60, Appendix B Performance Specifications 2 and 3, or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [40 CFR 60.334(b)(1) and, District Rule 1080, 6.3, 6.5, 6.6, & 7.2] Federally Enforceable Through Title V Permit
- 31. The CEMS shall be linked to a data logger which is compatible with the District's Data acquisition system. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080, 7.1] Federally Enforceable Through Title V **Permit**
- 32. The owner or operator shall maintain CEMS records that contain the following: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, maintenance, duration of any periods during which a continuous monitoring system or monitoring device is inoperative, and emission measurements. [40 CFR 60.7(b) and District Rule 1080, 7.3] Federally Enforceable Through Title V Permit
- 33. The owner or operator shall submit a written report of CEM operations for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include the following: Time intervals, data and magnitude of excess NOx emissions, nature and the cause of excess (if known), corrective actions taken and preventive measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; Applicable time and date of each period during which the CEM was inoperative (monitor downtime), except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred. [40 CFR 60.334(j), (j)(5) and District Rule 1080, 8.0] Federally Enforceable Through Title V Permit
- 34. Excess emissions shall be defined as any operating hour in which 4-hour rolling average NOx concentration exceeds applicable emissions limit and a period of monitor downtime shall be any unit operating hour in which sufficient data are not obtained to validate the hour for either NOx or O2 (or both). [40 CFR 60.334(J)(1)(iii)] Federally Enforceable Through Title V Permit
- 35. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the monitoring devices required by this rule to ensure that such devices are functioning properly. [District Rule 1080, 11.0] Federally Enforceable Through Title V Permit
- 36. Reduced Load Period shall be defined as the time during which a gas turbine is operated at less than rated capacity in order to change the exhaust gas diverter gate not exceeding one hour. [District Rule 4703, 3.19] Federally Enforceable Through Title V Permit
- 37. Thermal Stabilization Period shall be defined as the start up or shut down time during which the exhaust gas is not within the normal operating range, not to exceed two hours. [District Rule 4703, 3.25] Federally Enforceable Through Title V Permit
- 38. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
- 39. The sulfur content of each fuel source shall be: (i) documented in a valid purchase contract, a supplier certification, a tariff sheet or transportation contract or (ii) monitored weekly using ASTM Methods D4084, D5504, D6228, or Gas Processors Association Standard 2377. If H2S content is less than 0.25 gr/100 scf for 8 consecutive weeks, then the Monitoring frequency shall be every six (6) months. If any six (6) month monitoring show an exceedance, weekly monitoring shall resume. [40 CFR 60.334(h)(3) and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 40. Performance testing shall be conducted annually to measure NOx and CO emission concentrations using the following test methods: EPA Methods 7E or 20 for NOx emissions, EPA Methods 10 or 10B for CO emissions, EPA Methods 3, 3A, or 20 for Oxygen content of the exhaust gas. The 9-run tests shall be performed at highest physically achievable load of the gas turbine. [40 CFR 60.335(a), (b)(7) and District Rule 4703, 6.3.1, 6.4.1, 6.4.2, & 6.4.3] Federally Enforceable Through Title V Permit

- 41. The owner or operator shall be required to conform to the sampling facilities and testing procedures described in District Rule 1081, 3.0, & 6.0 (as amended 12/16/93). [District Rule 1081, 3.0 & 6.0] Federally Enforceable Through Title V Permit
- 42. The District must be notified 30 days prior to any performance testing and a test plan shall be submitted for District approval 15 days prior to such testing. [District Rule 1081, 7.1] Federally Enforceable Through Title V Permit
- 43. Performance testing shall be witnessed or authorized District personnel. Test results must be submitted to the District within 60 days of performance testing. [District Rule 1081, 7.2, 7.3] Federally Enforceable Through Title V Permit
- 44. The owner or operator of a stationary gas turbine system 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 and 4703, 6.2.4] Federally Enforceable Through Title V Permit
- 45. Results of the CEM system shall be averaged over a three hour period, using consecutive 15-minute sampling periods in accordance with all applicable requirements of CFR 60.13, [40 CFR 60.13 and District Rule 4703, 5.1, 6.4] Federally Enforceable Through Title V Permit
- 46. Owner or operator shall maintain a stationary gas turbine system operating log that includes, on a daily basis, the actual local time start-up and stop time, length and reason for reduced load periods, total hours of operation, type and quantity of fuel used. [District Rule 4703, 6.2.6] Federally Enforceable Through Title V Permit
- 47. Compliance with the ammonia slip (ppmv) emission limits shall be demonstrated by sample collection taken by independent testing laboratory annually within 60 days prior to permit anniversary date. The District shall be notified prior to the completion of any sampling event. Official test results and field data collection shall be submitted to the District within 60 days of testing. [District Rule 4102]
- 48. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V **Permit**
- 49. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.332 (a)(1), (a)(2), 60.333 (b); 60.334(b) (b)(1), (b)(2), (h)(3), (j), (j)(1)(iii), and (j)(5), and 60.335(a), (b)(7), (b)(3), and District Rule 4703 (as amended 9/20/07), Sections 5.1.2.1, 5.2, 6.2.2, 6.2.6, 6.3, and 6.4. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V **Permit**
- 50. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.7(b), 60.8, 60.13, and District Rules 1080 (as amended 12/17/92), Sections 6.3, 6.4, 6.5, 6.6, 7.1, 7.2, 7.3, 8.0, and 11.0; 1081(as amended 12/16/93), Sections 3.0, 6.0, 7.1, 7.2, and 7.3; and 4201 (as amended 12/17/92). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

Location: HEAVY OIL WESTERN,4905 REWARD RD,MCKITTRICK, CA 93251 \$-1251-1-11: Sep 21 2017 11 284M - NORMANR

ATTACHMENT C

Detailed Summary List of Facility Permits

SJVUAPCD SOUTHERN

Detailed Facility Report For Facility=1251

Sorted by Facility Name and Permit Number

9/21/17

11:31 am

MCKITTRICK LIMITED HEAVY OIL WESTERN 4905 REWARD RD MCKITTRICK, CA 93251	FAC # STATUS: TELEPHONE:	S 1251 A 6613936885		TYPE: TOXIC ID:	TitleV 50150	EXPIRE ON: AREA: INSP. DATE:	03/31/2017 3 / 06/18
	FEE	FEE	PERMIT				

PERMIT NUMBER FEE DESCRIPTION **FEE RULE** QTY **AMOUNT** TOTAL STATUS **EQUIPMENT DESCRIPTION** 3020-08A G 48 MW COGENERATION SYSTEM WITH SCR INCLUDING STEWART & S-1251-1-11 48 MW 1 11,178.00 11,178.00 Α STEVENSON GE LM 5000 GAS-FIRED TURBINE, HEAT RECOVERY STEAM GENERATOR, AND INLET AIR ABSORPTION CHILLER AND HEAT EXCHANGER

Number of Facilities Reported: 1