

May 20, 2021

Mr. Juan Campos  
Elk Hills Power, LLC  
4026 Sky Line Road  
Tupman, CA 93276

**Re: Final - Authorities to Construct / Certificates of Conformity (Significant Mod)**  
**Facility Number: S-9168**  
**Project Number: S-1200348**

Dear Mr. Campos:

The Air Pollution Control Officer has issued Authorities to Construct (ATCs) S-9168-1-2 through '-17-2, '-18-4, '-19-2 through '-22-2, and '-24-2 with Certificates of Conformity to Elk Hills Power, LLC at Elk Hills 35R Gas Plant in Kern County. The Authorities to Construct are to increase the fugitive VOC emissions limits to 23 Permits to Operate (PTOs). Enclosed are the ATCs and a copy of the notice of final action that has been posted on the District's website ([www.valleyair.org](http://www.valleyair.org)).

Notice of the District's preliminary decision to issue the ATCs was posted on March 30, 2021. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on March 30, 2021. No comments were received following the District's preliminary decision on this project.

Also enclosed is an invoice for the engineering evaluation fees pursuant to District Rule 3010. Please remit the amount owed, along with a copy of the attached invoice, within 60 days.

Prior to operating with the modifications authorized by the ATCs, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5. Application forms are found on the District's website at [www.valleyair.org/permits/TVforms](http://www.valleyair.org/permits/TVforms).

**Samir Sheikh**  
Executive Director/Air Pollution Control Officer

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

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

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

May 20, 2021

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

Sincerely,

A handwritten signature in blue ink that reads "Brian Clements". The signature is written in a cursive style.

Brian Clements  
Director of Permit Services

Enclosures

cc: Courtney Graham, CARB (w/enclosure) via email  
cc: Laura Yannayon, EPA (w/enclosure) via EPS

Facility # S-9168  
ELK HILLS POWER LLC  
35R GAS PLANT  
4026 SKYLINE ROAD  
TUPMAN, CA 93276

## **AUTHORITY TO CONSTRUCT (ATC)**

### **QUICK START GUIDE**

1. **Pay Invoice:** Please pay enclosed invoice before due date.
2. **Modify Your Title V Permit.** Prior to operating the equipment authorized under this ATC, submit an application to modify your Title V permit. See application forms at <http://www.valleyair.org/permits/TVforms>.
3. **Fully Understand ATC:** Make sure you understand ALL conditions in the ATC prior to construction, modification and/or operation.
4. **Follow ATC:** You must construct, modify and/or operate your equipment as specified on the ATC. Any unspecified changes may require a new ATC.
5. **Notify District:** You must notify the District's Compliance Department, at the telephone numbers below, upon start-up and/or operation under the ATC. Please record the date construction or modification commenced and the date the equipment began operation under the ATC. You may NOT operate your equipment until you have notified the District's Compliance Department. A startup inspection may be required prior to receiving your Permit to Operate.
6. **Source Test:** Schedule and perform any required source testing. See [http://www.valleyair.org/busind/comply/source\\_testing.htm](http://www.valleyair.org/busind/comply/source_testing.htm) for source testing resources.
7. **Maintain Records:** Maintain all records required by ATC. Records are reviewed during every inspection (or upon request) and must be retained for at least 5 years. Sample record keeping forms can be found at [http://www.valleyair.org/busind/comply/compliance\\_forms.htm](http://www.valleyair.org/busind/comply/compliance_forms.htm).

By operating in compliance, you are doing your part to improve air quality for all Valley residents.

**For assistance, please contact District Compliance staff at  
any of the telephone numbers listed below.**

**Samir Sheikh**

Executive Director/Air Pollution Control Officer

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

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

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: (861) 392-5500 FAX: (861) 392-5585



# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-9168-1-2

**ISSUANCE DATE:** 05/13/2021

**LEGAL OWNER OR OPERATOR:** ELK HILLS POWER LLC

**MAILING ADDRESS:**  
35R GAS PLANT  
4026 SKYLINE ROAD  
TUPMAN, CA 93276

**LOCATION:**  
35R GAS PLANT  
SECTION SE35, T30S, R23E  
TUPMAN, CA

**SECTION:** NW35 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF INLET GAS SYSTEM WITH ELECTRIC MOTOR DRIVEN INLET GAS COMPRESSOR(S):  
INCREASE FUGITIVE VOC EMISSION LIMIT

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 12,118 lb, 2nd quarter - 12,118 lb, 3rd quarter - 12,119 lb, and 4th quarter - 12,119 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 2/18/16) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificate Number S-3951-1 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

S-9168-1-2 : May 13 2021 2:06PM -- RAMIREZH : Joint Inspection NOT Required

5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using screening value emissions factors of CARB/CAPCOA "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities" included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). Emissions shall be calculated after each quarterly inspection period as required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
8. This permit allows for a specified percentage of allowed leaking components as defined in this permit to be discovered within prescribed timeframes under District Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
9. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
10. BACT Requirement Any leak greater than 500 ppmv for pump seals and compressor seals and 100 ppmv for valves and connectors, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21 or leaking at a rate of greater than 3 drops of liquid per minute, shall be repaired in a manner consistent with the procedures specified in Rule 4409 (adopted April 20, 2005). This requirement shall not apply to inaccessible or unsafe-to-access components as identified in the revised Operator Management Plan required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
11. VOC fugitive emissions from the components in gas service shall not exceed 18.4 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. VOC content of the non-condensable vapors shall not exceed 35% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Operator shall test and maintain records of VOC content of the non-condensable vapors no less than annually. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The VOC content by weight percent (wt. %) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases. [District Rule 1081] Federally Enforceable Through Title V Permit
15. Permittee shall comply with applicable monitoring, inspection, maintenance, recordkeeping, reporting, and leak requirements of 40 CFR Part 60 Subpart KKK and Rule 4409. [40 CFR Part 60 Subpart KKK, District Rule 2201, and District Rule 4409] Federally Enforceable Through Title V Permit
16. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-9168-2-2

**ISSUANCE DATE:** 05/13/2021

**LEGAL OWNER OR OPERATOR:** ELK HILLS POWER LLC

**MAILING ADDRESS:**  
35R GAS PLANT  
4026 SKYLINE ROAD  
TUPMAN, CA 93276

**LOCATION:**  
35R GAS PLANT  
SECTION SE35, T30S, R23E  
TUPMAN, CA

**SECTION:** NW35 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF MERCURY REMOVAL SYSTEM WITH INLET GAS FILTER SEPARATOR, MERCURY GUARD BED:  
REVISE FUGITIVE EMISSION LIMIT AND LEAK REQUIREMENTS

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. ATC S-9168-1-2 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

### CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO



Brian Clements, Director of Permit Services

S-9168-2-2 : May 13 2021 2:06PM -- RAMIREZH : Joint Inspection NOT Required

6. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using screening value emissions factors of CARB/CAPCOA "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities" included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). Emissions shall be calculated after each quarterly inspection period as required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
7. This permit allows for a specified percentage of allowed leaking components as defined in this permit to be discovered within prescribed time frames under Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
8. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
9. BACT Requirement Any leak greater than 500 ppmv for pump seals and compressor seals and 100 ppmv for valves and connectors, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21 or leaking at a rate of greater than 3 drops of liquid per minute, shall be repaired in a manner consistent with the procedures specified in Rule 4409 (adopted April 20, 2005). This requirement shall not apply to inaccessible or unsafe-to-access components as identified in the revised Operator Management Plan required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
10. VOC fugitive emissions from the components in gas service shall not exceed 5.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. VOC content of the non-condensable vapors shall not exceed 35% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Operator shall test and maintain records of VOC content of the non-condensable vapors no less than annually. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The VOC content by weight percent (wt. %) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases. [District Rule 1081] Federally Enforceable Through Title V Permit
14. Permittee shall comply with applicable monitoring, inspection, maintenance, recordkeeping, reporting, and leak requirements of 40 CFR Part 60 Subpart KKK and Rule 4409. [40 CFR Part 60 Subpart KKK, District Rule 2201, and District Rule 4409] Federally Enforceable Through Title V Permit
15. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit



# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-9168-3-2

**ISSUANCE DATE:** 05/13/2021

**LEGAL OWNER OR OPERATOR:** ELK HILLS POWER LLC

**MAILING ADDRESS:**  
35R GAS PLANT  
4026 SKYLINE ROAD  
TUPMAN, CA 93276

**LOCATION:**  
35R GAS PLANT  
SECTION SE35, T30S, R23E  
TUPMAN, CA

**SECTION:** NW35 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF INLET GAS TREATING WITH INLET GAS AMINE CONTACTOR, TREATED GAS COOLER, LEAN GLYCOL COOLER, TREATED GAS FILTER SEPARATOR: INCREASE FUGITIVE VOC EMISSION LIMIT

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. ATC S-9168-1-2 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

### CONDITIONS CONTINUE ON NEXT PAGE

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Samir Sheikh, Executive Director / APCO



Brian Clements, Director of Permit Services

S-9168-3-2 : May 13 2021 2:06PM -- RAMIREZH : Joint Inspection NOT Required



6. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using screening value emissions factors of CARB/CAPCOA "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities" included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). Emissions shall be calculated after each quarterly inspection period as required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
7. This permit allows for a specified percentage of allowed leaking components as defined in this permit to be discovered within prescribed time frames under Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
8. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
9. BACT Requirement Any leak greater than 500 ppmv for pump seals and compressor seals and 100 ppmv for valves and connectors, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21 or leaking at a rate of greater than 3 drops of liquid per minute, shall be repaired in a manner consistent with the procedures specified in Rule 4409 (adopted April 20, 2005). This requirement shall not apply to inaccessible or unsafe-to-access components as identified in the revised Operator Management Plan required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
10. VOC fugitive emissions from the components in gas service shall not exceed 7.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. VOC content of the non-condensable vapors shall not exceed 35% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Operator shall test and maintain records of VOC content of the non-condensable vapors no less than annually. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The VOC content by weight percent (wt. %) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases. [District Rule 1081] Federally Enforceable Through Title V Permit
14. Permittee shall comply with applicable monitoring, inspection, maintenance, recordkeeping, reporting, and leak requirements of 40 CFR Part 60 Subpart KKK and Rule 4409. [40 CFR Part 60 Subpart KKK, District Rule 2201, and District Rule 4409] Federally Enforceable Through Title V Permit
15. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-9168-4-2

**ISSUANCE DATE:** 05/13/2021

**LEGAL OWNER OR OPERATOR:** ELK HILLS POWER LLC

**MAILING ADDRESS:**  
35R GAS PLANT  
4026 SKYLINE ROAD  
TUPMAN, CA 93276

**LOCATION:**  
35R GAS PLANT  
SECTION SE35, T30S, R23E  
TUPMAN, CA

**SECTION:** NW35 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF INLET GAS DEHYDRATION WITH MOLECULAR SIEVE DEHYDRATION, DRY GAS DUST FILTER, REGENERATION GAS HEATER, REGENERATION GAS COOLER AND SCRUBBER, AND REGENERATION GAS COOLER: INCREASE FUGITIVE VOC EMISSION LIMIT

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. ATC S-9168-1-2 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

### CONDITIONS CONTINUE ON NEXT PAGE

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Samir Sheikh, Executive Director / APCO



Brian Clements, Director of Permit Services

S-9168-4-2 : May 13 2021 2:06PM -- RAMIREZH : Joint Inspection NOT Required

6. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using screening value emissions factors of CARB/CAPCOA "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities" included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). Emissions shall be calculated after each quarterly inspection period as required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
7. This permit allows for a specified percentage of allowed leaking components as defined in this permit to be discovered within prescribed time frames under Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
8. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
9. BACT Requirement Any leak greater than 500 ppmv for pump seals and compressor seals and 100 ppmv for valves and connectors, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21 or leaking at a rate of greater than 3 drops of liquid per minute, shall be repaired in a manner consistent with the procedures specified in Rule 4409 (adopted April 20, 2005). This requirement shall not apply to inaccessible or unsafe-to-access components as identified in the revised Operator Management Plan required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
10. VOC fugitive emissions from the components in gas service shall not exceed 7.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. VOC content of the non-condensable vapors shall not exceed 35% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Operator shall test and maintain records of VOC content of the non-condensable vapors no less than annually. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The VOC content by weight percent (wt. %) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases. [District Rule 1081] Federally Enforceable Through Title V Permit
14. Permittee shall comply with applicable monitoring, inspection, maintenance, recordkeeping, reporting, and leak requirements of 40 CFR Part 60 Subpart KKK and Rule 4409. [40 CFR Part 60 Subpart KKK, District Rule 2201, and District Rule 4409] Federally Enforceable Through Title V Permit
15. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-9168-5-2

**ISSUANCE DATE:** 05/13/2021

**LEGAL OWNER OR OPERATOR:** ELK HILLS POWER LLC

**MAILING ADDRESS:**  
35R GAS PLANT  
4026 SKYLINE ROAD  
TUPMAN, CA 93276

**LOCATION:**  
35R GAS PLANT  
SECTION SE35, T30S, R23E  
TUPMAN, CA

**SECTION:** NW35 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF NGL RECOVERY WITH EXPANDER/BOOSTER COMPRESSOR, GAS/GAS EXCHANGER, COLD SEPARATOR, DEMETHANIZER REBOILERS, DEMETHANIZER, AND DEETHANIZER FEED PUMPS: INCREASE FUGITIVE VOC EMISSION LIMITS

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. ATC S-9168-1-2 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO



Brian Clements, Director of Permit Services

S-9168-5-2 : May 13 2021 2:06PM -- RAMIREZH : Joint Inspection NOT Required

6. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using screening value emissions factors of CARB/CAPCOA "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities" included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). Emissions shall be calculated after each quarterly inspection period as required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
7. This permit allows for a specified percentage of allowed leaking components as defined in this permit to be discovered within prescribed time frames under Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
8. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
9. BACT Requirement Any leak greater than 500 ppmv for pump seals and compressor seals and 100 ppmv for valves and connectors, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21 or leaking at a rate of greater than 3 drops of liquid per minute, shall be repaired in a manner consistent with the procedures specified in Rule 4409 (adopted April 20, 2005). This requirement shall not apply to inaccessible or unsafe-to-access components as identified in the revised Operator Management Plan required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
10. VOC fugitive emissions from the components in gas service shall not exceed 9.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. VOC content of the non-condensable vapors shall not exceed 35% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Operator shall test and maintain records of VOC content of the non-condensable vapors no less than annually. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The VOC content by weight percent (wt. %) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases. [District Rule 1081] Federally Enforceable Through Title V Permit
14. Permittee shall comply with applicable monitoring, inspection, maintenance, recordkeeping, reporting, and leak requirements of 40 CFR Part 60 Subpart KKK and Rule 4409. [40 CFR Part 60 Subpart KKK, District Rule 2201, and District Rule 4409] Federally Enforceable Through Title V Permit
15. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit



# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-9168-6-2

**ISSUANCE DATE:** 05/13/2021

**LEGAL OWNER OR OPERATOR:** ELK HILLS POWER LLC

**MAILING ADDRESS:**  
35R GAS PLANT  
4026 SKYLINE ROAD  
TUPMAN, CA 93276

**LOCATION:**  
35R GAS PLANT  
SECTION SE35, T30S, R23E  
TUPMAN, CA

**SECTION:** NW35 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF RESIDUE GAS COMPRESSION WITH ELECTRIC MOTOR DRIVEN RESIDUE GAS COMPRESSOR(S), RESIDUE GAS COALESCER(S): INCREASE FUGITIVE VOC EMISSION LIMIT

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. ATC S-9168-1-2 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

S-9168-6-2 : May 13 2021 2:06PM -- RAMIREZH : Joint Inspection NOT Required

6. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using screening value emissions factors of CARB/CAPCOA "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities" included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). Emissions shall be calculated after each quarterly inspection period as required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
7. This permit allows for a specified percentage of allowed leaking components as defined in this permit to be discovered within prescribed time frames under Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
8. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
9. BACT Requirement Any leak greater than 500 ppmv for pump seals and compressor seals and 100 ppmv for valves and connectors, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21 or leaking at a rate of greater than 3 drops of liquid per minute, shall be repaired in a manner consistent with the procedures specified in Rule 4409 (adopted April 20, 2005). This requirement shall not apply to inaccessible or unsafe-to-access components as identified in the revised Operator Management Plan required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
10. VOC fugitive emissions from the components in gas service shall not exceed 1.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. VOC content of the non-condensable vapors shall not exceed 5.0% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Operator shall test and maintain records of VOC content of the non-condensable vapors no less than annually. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The VOC content by weight percent (wt. %) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases. [District Rule 1081] Federally Enforceable Through Title V Permit
14. Permittee shall comply with applicable monitoring, inspection, maintenance, recordkeeping, reporting, and leak requirements of 40 CFR Part 60 Subpart KKK and Rule 4409. [40 CFR Part 60 Subpart KKK, District Rule 2201, and District Rule 4409] Federally Enforceable Through Title V Permit
15. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit



# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-9168-7-2

**ISSUANCE DATE:** 05/13/2021

**LEGAL OWNER OR OPERATOR:** ELK HILLS POWER LLC

**MAILING ADDRESS:**  
35R GAS PLANT  
4026 SKYLINE ROAD  
TUPMAN, CA 93276

**LOCATION:**  
35R GAS PLANT  
SECTION SE35, T30S, R23E  
TUPMAN, CA

**SECTION:** NW35 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF DEETHANIZER WITH REFLUX CONDENSER: INCREASE FUGITIVE VOC EMISSION LIMIT

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. ATC S-9168-1-2 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO



Brian Clements, Director of Permit Services

S-9168-7-2 : May 13 2021 2:06PM -- RAMIREZH : Joint Inspection NOT Required

6. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using screening value emissions factors of CARB/CAPCOA "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities" included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). Emissions shall be calculated after each quarterly inspection period as required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
7. This permit allows for a specified percentage of allowed leaking components as defined in this permit to be discovered within prescribed time frames under Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
8. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
9. BACT Requirement Any leak greater than 500 ppmv for pump seals and compressor seals and 100 ppmv for valves and connectors, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21 or leaking at a rate of greater than 3 drops of liquid per minute, shall be repaired in a manner consistent with the procedures specified in Rule 4409 (adopted April 20, 2005). This requirement shall not apply to inaccessible or unsafe-to-access components as identified in the revised Operator Management Plan required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
10. VOC fugitive emissions from the components in gas service shall not exceed 12.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Permittee shall comply with applicable monitoring, inspection, maintenance, recordkeeping, reporting, and leak requirements of 40 CFR Part 60 Subpart KKK and Rule 4409. [40 CFR Part 60 Subpart KKK, District Rule 2201, and District Rule 4409] Federally Enforceable Through Title V Permit
12. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-9168-8-2

**ISSUANCE DATE:** 05/13/2021

**LEGAL OWNER OR OPERATOR:** ELK HILLS POWER LLC

**MAILING ADDRESS:**  
35R GAS PLANT  
4026 SKYLINE ROAD  
TUPMAN, CA 93276

**LOCATION:**  
35R GAS PLANT  
SECTION SE35, T30S, R23E  
TUPMAN, CA

**SECTION:** NW35 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF DEPROPANIZER WITH REFLUX CONDENSERS AND REFLUX DRUMS: INCREASE FUGITIVE VOC EMISSION LIMIT

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. ATC S-9168-1-2 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

### CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO



Brian Clements, Director of Permit Services

S-9168-8-2 : May 13 2021 2:06PM -- RAMIREZH : Joint Inspection NOT Required

6. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using screening value emissions factors of CARB/CAPCOA "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities" included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). Emissions shall be calculated after each quarterly inspection period as required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
7. This permit allows for a specified percentage of allowed leaking components as defined in this permit to be discovered within prescribed time frames under Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
8. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
9. BACT Requirement Any leak greater than 500 ppmv for pump seals and compressor seals and 100 ppmv for valves and connectors, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21 or leaking at a rate of greater than 3 drops of liquid per minute, shall be repaired in a manner consistent with the procedures specified in Rule 4409 (adopted April 20, 2005). This requirement shall not apply to inaccessible or unsafe-to-access components as identified in the revised Operator Management Plan required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
10. VOC fugitive emissions from the components in gas service shall not exceed 22.3 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Permittee shall comply with applicable monitoring, inspection, maintenance, recordkeeping, reporting, and leak requirements of 40 CFR Part 60 Subpart KKK and Rule 4409. [40 CFR Part 60 Subpart KKK, District Rule 2201, and District Rule 4409] Federally Enforceable Through Title V Permit
12. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-9168-9-2

**ISSUANCE DATE:** 05/13/2021

**LEGAL OWNER OR OPERATOR:** ELK HILLS POWER LLC

**MAILING ADDRESS:**  
35R GAS PLANT  
4026 SKYLINE ROAD  
TUPMAN, CA 93276

**LOCATION:**  
35R GAS PLANT  
SECTION SE35, T30S, R23E  
TUPMAN, CA

**SECTION:** NW35 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF DEBUTANIZER WITH REFLUX CONDENSERS AND REFLUX DRUMS: INCREASE FUGITIVE VOC EMISSION LIMIT

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. ATC S-9168-1-2 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

### CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO



Brian Clements, Director of Permit Services

S-9168-9-2 : May 13 2021 2:06PM -- RAMIREZH : Joint Inspection NOT Required

6. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using screening value emissions factors of CARB/CAPCOA "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities" included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). Emissions shall be calculated after each quarterly inspection period as required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
7. This permit allows for a specified percentage of allowed leaking components as defined in this permit to be discovered within prescribed time frames under Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
8. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
9. BACT Requirement Any leak greater than 500 ppmv for pump seals and compressor seals and 100 ppmv for valves and connectors, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21 or leaking at a rate of greater than 3 drops of liquid per minute, shall be repaired in a manner consistent with the procedures specified in Rule 4409 (adopted April 20, 2005). This requirement shall not apply to inaccessible or unsafe-to-access components as identified in the revised Operator Management Plan required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
10. VOC fugitive emissions from the components in gas service shall not exceed 20.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Permittee shall comply with applicable monitoring, inspection, maintenance, recordkeeping, reporting, and leak requirements of 40 CFR Part 60 Subpart KKK and Rule 4409. [40 CFR Part 60 Subpart KKK, District Rule 2201, and District Rule 4409] Federally Enforceable Through Title V Permit
12. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-9168-10-2

**ISSUANCE DATE:** 05/13/2021

**LEGAL OWNER OR OPERATOR:** ELK HILLS POWER LLC

**MAILING ADDRESS:**  
35R GAS PLANT  
4026 SKYLINE ROAD  
TUPMAN, CA 93276

**LOCATION:**  
35R GAS PLANT  
SECTION SE35, T30S, R23E  
TUPMAN, CA

**SECTION:** NW35 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF REFRIGERATION SYSTEM WITH REFRIGERANT SUCTION SCRUBBER, REFRIGERANT COMPRESSOR(S) AND COMPRESSOR COMPONENTS, REFRIGERANT FLASH DRUM, REFRIGERANT CONDENSERS AND COMPONENTS, AND REFRIGERANT SURGE DRUM: INCREASE FUGITIVE VOC EMISSION LIMIT

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. ATC S-9168-1-2 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO



Brian Clements, Director of Permit Services

S-9168-10-2 : May 13 2021 2:06PM -- RAMIREZH : Joint Inspection NOT Required



6. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using screening value emissions factors of CARB/CAPCOA "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities" included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). Emissions shall be calculated after each quarterly inspection period as required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
7. This permit allows for a specified percentage of allowed leaking components as defined in this permit to be discovered within prescribed time frames under Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
8. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
9. BACT Requirement Any leak greater than 500 ppmv for pump seals and compressor seals and 100 ppmv for valves and connectors, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21 or leaking at a rate of greater than 3 drops of liquid per minute, shall be repaired in a manner consistent with the procedures specified in Rule 4409 (adopted April 20, 2005). This requirement shall not apply to inaccessible or unsafe-to-access components as identified in the revised Operator Management Plan required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
10. VOC fugitive emissions from the components in gas service shall not exceed 33.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Permittee shall comply with applicable monitoring, inspection, maintenance, recordkeeping, reporting and leak requirements of 40 CFR Part 60 Subpart KKK and Rule 4409. [40 CFR Part 60 Subpart KKK, District Rule 2201, and District Rule 4409] Federally Enforceable Through Title V Permit
12. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-9168-11-2

**ISSUANCE DATE:** 05/13/2021

**LEGAL OWNER OR OPERATOR:** ELK HILLS POWER LLC

**MAILING ADDRESS:**  
35R GAS PLANT  
4026 SKYLINE ROAD  
TUPMAN, CA 93276

**LOCATION:**  
35R GAS PLANT  
SECTION SE35, T30S, R23E  
TUPMAN, CA

**SECTION:** NW35 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF AMINE SYSTEM WITH AMINE REGENERATION PACKAGE: INCREASE FUGITIVE VOC EMISSION LIMIT

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. ATC S-9168-1-2 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

### CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO



Brian Clements, Director of Permit Services

S-9168-11-2 : May 13 2021 2:06PM -- RAMIREZH : Joint Inspection NOT Required

6. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using screening value emissions factors of CARB/CAPCOA "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities" included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). Emissions shall be calculated after each quarterly inspection period as required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
7. This permit allows for a specified percentage of allowed leaking components as defined in this permit to be discovered within prescribed time frames under Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
8. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
9. BACT Requirement Any leak greater than 500 ppmv for pump seals and compressor seals and 100 ppmv for valves and connectors, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21 or leaking at a rate of greater than 3 drops of liquid per minute, shall be repaired in a manner consistent with the procedures specified in Rule 4409 (adopted April 20, 2005). This requirement shall not apply to inaccessible or unsafe-to-access components as identified in the revised Operator Management Plan required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
10. VOC fugitive emissions from the components in gas service shall not exceed 7.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. VOC content of the non-condensable vapors shall not exceed 35% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Operator shall test and maintain records of VOC content of the non-condensable vapors no less than annually. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The VOC content by weight percent (wt. %) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases. [District Rule 1081] Federally Enforceable Through Title V Permit
14. Permittee shall comply with applicable monitoring, inspection, maintenance, recordkeeping, reporting, and leak requirements of 40 CFR Part 60 Subpart KKK and Rule 4409. [40 CFR Part 60 Subpart KKK, District Rule 2201, and District Rule 4409] Federally Enforceable Through Title V Permit
15. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-9168-12-2

**ISSUANCE DATE:** 05/13/2021

**LEGAL OWNER OR OPERATOR:** ELK HILLS POWER LLC

**MAILING ADDRESS:**  
35R GAS PLANT  
4026 SKYLINE ROAD  
TUPMAN, CA 93276

**LOCATION:**  
35R GAS PLANT  
SECTION SE35, T30S, R23E  
TUPMAN, CA

**SECTION:** NW35 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF GLYCOL SYSTEM WITH GLYCOL REGENERATION PACKAGE: INCREASE FUGITIVE VOC EMISSION LIMIT

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. ATC S-9168-1-2 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO



Brian Clements, Director of Permit Services

S-9168-12-2 : May 13 2021 2:06PM -- RAMIREZH : Joint Inspection NOT Required

6. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using screening value emissions factors of CARB/CAPCOA "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities" included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). Emissions shall be calculated after each quarterly inspection period as required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
7. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
8. BACT Requirement Any leak greater than 500 ppmv for pump seals and compressor seals and 100 ppmv for valves and connectors, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21 or leaking at a rate of greater than 3 drops of liquid per minute, shall be repaired in a manner consistent with the procedures specified in Rule 4409 (adopted April 20, 2005). This requirement shall not apply to inaccessible or unsafe-to-access components as identified in the revised Operator Management Plan required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
9. VOC fugitive emissions from the components in gas service shall not exceed 7.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. VOC content of the non-condensable vapors shall not exceed 35% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Operator shall test and maintain records of VOC content of the non-condensable vapors no less than annually. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The VOC content by weight percent (wt. %) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases. [District Rule 1081] Federally Enforceable Through Title V Permit
13. Permittee shall comply with applicable monitoring, inspection, maintenance, recordkeeping, reporting, and leak requirements of 40 CFR Part 60 Subpart KKK and Rule 4409. [40 CFR Part 60 Subpart KKK, District Rule 2201, and District Rule 4409] Federally Enforceable Through Title V Permit
14. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-9168-13-2

**ISSUANCE DATE:** 05/13/2021

**LEGAL OWNER OR OPERATOR:** ELK HILLS POWER LLC

**MAILING ADDRESS:**  
35R GAS PLANT  
4026 SKYLINE ROAD  
TUPMAN, CA 93276

**LOCATION:**  
35R GAS PLANT  
SECTION SE35, T30S, R23E  
TUPMAN, CA

**SECTION:** NW35 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF PROPANE TANK (EXEMPT), BUTANE TANK (EXEMPT), AND 16,250 GALLON NATURAL GAS TANK: INCREASE FUGITIVE VOC EMISSION LIMIT

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. ATC S-9168-1-2 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Natural gasoline (NGL) storage tank and all piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO



Brian Clements, Director of Permit Services

S-9168-13-2 : May 13 2021 2:06PM -- RAMIREZH : Joint Inspection NOT Required

6. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using screening value emissions factors of CARB/CAPCOA "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities" included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). Emissions shall be calculated after each quarterly inspection period as required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
8. This permit allows for a specified percentage of allowed leaking components as defined in this permit to be discovered within prescribed time frames under Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
9. BACT Requirement Any leak greater than 500 ppmv for pump seals and compressor seals and 100 ppmv for valves and connectors, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21 or leaking at a rate of greater than 3 drops of liquid per minute, shall be repaired in a manner consistent with the procedures specified in Rule 4409 (adopted April 20, 2005). This requirement shall not apply to inaccessible or unsafe-to-access components as identified in the revised Operator Management Plan required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
10. VOC fugitive emissions from the components in gas service shall not exceed 34.9 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Permittee shall comply with applicable monitoring, inspection, maintenance, recordkeeping, reporting, and leak requirements of 40 CFR Part 60 Subpart KKK and Rule 4409. [40 CFR Part 60 Subpart KKK, District Rule 2201, and District Rule 4409] Federally Enforceable Through Title V Permit
12. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit



# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-9168-14-2

**ISSUANCE DATE:** 05/13/2021

**LEGAL OWNER OR OPERATOR:** ELK HILLS POWER LLC

**MAILING ADDRESS:**  
35R GAS PLANT  
4026 SKYLINE ROAD  
TUPMAN, CA 93276

**LOCATION:**  
35R GAS PLANT  
SECTION SE35, T30S, R23E  
TUPMAN, CA

**SECTION:** NW35 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF HOT OIL SYSTEM WITH HOT OIL EXPANSION TANK, HOT OIL PUMPS, AND 164 MMBTU/HR HOT OIL HEATER WITH JOHN ZINK C-RMB RAPID MIX ULTRA-LOW NOX BURNER: INCREASE FUGITIVE VOC EMISSION LIMIT

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. ATC S-9168-1-2 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO



Brian Clements, Director of Permit Services

S-9168-14-2 : May 13 2021 2:06PM -- RAMIREZH : Joint Inspection NOT Required

5. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using screening value emissions factors of CARB/CAPCOA "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities" included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). Emissions shall be calculated after each quarterly inspection period as required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
6. This permit allows for a specified percentage of allowed leaking components as defined in this permit to be discovered within prescribed time frames under Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
7. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
8. BACT Requirement Any leak greater than 500 ppmv for pump seals and compressor seals and 100 ppmv for valves and connectors, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21 or leaking at a rate of greater than 3 drops of liquid per minute, shall be repaired in a manner consistent with the procedures specified in Rule 4409 (adopted April 20, 2005). This requirement shall not apply to inaccessible or unsafe-to-access components as identified in the revised Operator Management Plan required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
9. VOC fugitive emissions from the components in gas service on tank shall not exceed 20.3 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Hot oil heater shall only be fired on PUC-quality natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Emissions from the natural gas-fired unit shall not exceed any of the following limits: 5 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0062 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, 100 ppmvd CO @ 3% O<sub>2</sub> or 0.074 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
12. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
13. Source testing to measure NO<sub>x</sub> and CO emissions from this unit while fired on natural gas shall be conducted within 60 days of startup and at least once every twelve (12) months thereafter. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
14. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
16. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
21. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
22. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
23. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. Permittee shall comply with applicable monitoring, inspection, maintenance, recordkeeping, reporting, and leak requirements of 40 CFR Part 60 Subpart KKK and Rule 4409. [40 CFR Part 60 Subpart KKK, District Rule 2201, and District Rule 4409] Federally Enforceable Through Title V Permit
26. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit



# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-9168-15-2

**ISSUANCE DATE:** 05/13/2021

**LEGAL OWNER OR OPERATOR:** ELK HILLS POWER LLC

**MAILING ADDRESS:** 35R GAS PLANT  
4026 SKYLINE ROAD  
TUPMAN, CA 93276

**LOCATION:** 35R GAS PLANT  
SECTION SE35, T30S, R23E  
TUPMAN, CA

**SECTION:** NW35 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF OVERHEAD GAS SYSTEM WITH FUEL GAS SCRUBBER, ETHANE/CO2 GLYCOL CONTACTOR, ETHANE/CO2 COMPRESSOR(S), ETHANE COOLERS AND ETHANE COOLER COMPONENTS: INCREASE FUGITIVE VOC EMISSION LIMIT

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. ATC S-9168-1-2 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

S-9168-15-2 : May 13 2021 2:06PM -- RAMIREZH : Joint Inspection NOT Required

6. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using screening value emissions factors of CARB/CAPCOA "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities" included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). Emissions shall be calculated after each quarterly inspection period as required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
7. This permit allows for a specified percentage of allowed leaking components as defined in this permit to be discovered within prescribed time frames under Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
8. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
9. BACT Requirement Any leak greater than 500 ppmv for pump seals and compressor seals and 100 ppmv for valves and connectors, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21 or leaking at a rate of greater than 3 drops of liquid per minute, shall be repaired in a manner consistent with the procedures specified in Rule 4409 (adopted April 20, 2005). This requirement shall not apply to inaccessible or unsafe-to-access components as identified in the revised Operator Management Plan required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
10. VOC fugitive emissions from the components in gas service shall not exceed 5.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. VOC content of the non-condensable vapors shall not exceed 18 % by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Operator shall test and maintain records of VOC content of the non-condensable vapors no less than annually. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The VOC content by weight percent (wt. %) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases. [District Rule 1081] Federally Enforceable Through Title V Permit
14. Permittee shall comply with applicable monitoring, inspection, maintenance, recordkeeping, reporting, and leak requirements of 40 CFR Part 60 Subpart KKK and Rule 4409. [40 CFR Part 60 Subpart KKK, District Rule 2201, and District Rule 4409] Federally Enforceable Through Title V Permit
15. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-9168-16-2

**ISSUANCE DATE:** 05/13/2021

**LEGAL OWNER OR OPERATOR:** ELK HILLS POWER LLC

**MAILING ADDRESS:**  
35R GAS PLANT  
4026 SKYLINE ROAD  
TUPMAN, CA 93276

**LOCATION:**  
35R GAS PLANT  
SECTION SE35, T30S, R23E  
TUPMAN, CA

**SECTION:** NW35 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF METHANOL INJECTION SYSTEM INCLUDING 1,000 GALLON TANK SERVED BY VAPOR CONTROL SYSTEM: INCREASE FUGITIVE VOC EMISSION LIMIT

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. ATC S-9168-1-2 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank. The vapors shall be discharged to the gas plant's vacuum system. [District Rule 2201] Federally Enforceable Through Title V Permit

### CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO



Brian Clements, Director of Permit Services

S-9168-16-2 : May 13 2021 2:06PM -- RAMIREZH : Joint Inspection NOT Required

6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using screening value emissions factors of CARB/CAPCOA "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities" included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). Emissions shall be calculated after each quarterly inspection period as required by Rule 4409. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This permit allows for a specified percentage of allowed leaking components as defined in this permit to be discovered within prescribed time frames under Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
9. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
10. BACT Requirement Any leak greater than 500 ppmv for pump seals and compressor seals and 100 ppmv for valves and connectors, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21 or leaking at a rate of greater than 3 drops of liquid per minute, shall be repaired in a manner consistent with the procedures specified in Rule 4409 (adopted April 20, 2005). This requirement shall not apply to inaccessible or unsafe-to-access components as identified in the revised Operator Management Plan required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
11. VOC fugitive emissions from components shall not exceed 17.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Permittee shall comply with applicable monitoring, inspection, maintenance, recordkeeping, reporting, and leak requirements of 40 CFR Part 60 Subpart KKK and Rule 4409. [40 CFR Part 60 Subpart KKK, District Rule 2201, and District Rule 4409] Federally Enforceable Through Title V Permit
13. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit



# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-9168-17-2

**ISSUANCE DATE:** 05/13/2021

**LEGAL OWNER OR OPERATOR:** ELK HILLS POWER LLC

**MAILING ADDRESS:**  
35R GAS PLANT  
4026 SKYLINE ROAD  
TUPMAN, CA 93276

**LOCATION:**  
35R GAS PLANT  
SECTION SE35, T30S, R23E  
TUPMAN, CA

**SECTION:** NW35 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 2000 GALLON AMINE SUMP TANK: INCREASE FUGITIVE VOC EMISSION LIMIT

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. ATC S-9168-1-2 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

### CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO



Brian Clements, Director of Permit Services

S-9168-17-2 : May 13 2021 2:06PM -- RAMIREZH : Joint Inspection NOT Required

6. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using screening value emissions factors of CARB/CAPCOA "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities" included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). Emissions shall be calculated after each quarterly inspection period as required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
7. This permit allows for a specified percentage of allowed leaking components as defined in this permit to be discovered within prescribed time frames under Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
8. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. A gas or liquid leak is a violation of this permit and shall be reported as a deviation. [District Rule 2201] Federally Enforceable Through Title V Permit
9. BACT Requirement Any leak greater than 500 ppmv for pump seals and compressor seals and 100 ppmv for valves and connectors, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21 or leaking at a rate of greater than 3 drops of liquid per minute, shall be repaired in a manner consistent with the procedures specified in Rule 4409 (adopted April 20, 2005). This requirement shall not apply to inaccessible or unsafe-to-access components as identified in the revised Operator Management Plan required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
10. VOC fugitive emissions from the components in gas service shall not exceed 6.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. VOC content of the non-condensable vapors shall not exceed 35% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Operator shall test and maintain records of VOC content of the non-condensable vapors no less than annually. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The VOC content by weight percent (wt. %) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases. [District Rule 1081] Federally Enforceable Through Title V Permit
14. Permittee shall comply with applicable monitoring, inspection, maintenance, recordkeeping, reporting, and leak requirements of 40 CFR Part 60 Subpart KKK and Rule 4409. [40 CFR Part 60 Subpart KKK, District Rule 2201, and District Rule 4409] Federally Enforceable Through Title V Permit
15. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-9168-18-4

**ISSUANCE DATE:** 05/13/2021

**LEGAL OWNER OR OPERATOR:** ELK HILLS POWER LLC

**MAILING ADDRESS:**  
35R GAS PLANT  
4026 SKYLINE ROAD  
TUPMAN, CA 93276

**LOCATION:**  
35R GAS PLANT  
SECTION SE35, T30S, R23E  
TUPMAN, CA

**SECTION:** NW35 **TOWNSHIP:** 30S **RANGE:** R23E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 3000 GALLON GLYCOL SUMP TANK: INCREASE FUGITIVE VOC EMISSION LIMIT

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. ATC S-9168-1-2 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The tank shall be equipped with a fixed roof with no holes or openings. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO



Brian Clements, Director of Permit Services

S-9168-18-4 : May 13 2021 2:06PM -- RAMIREZH : Joint Inspection NOT Required

6. This tank shall be equipped with a pressure-vacuum (PV) relief valve set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve's set pressure. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. This tank shall be in a leak-free condition. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
9. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using screening value emissions factors of CARB/CAPCOA "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities" included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). Emissions shall be calculated after each quarterly inspection period as required by Rule 4409. Emissions shall be calculated after each quarterly inspection period as required by Rule 4409. [District Rule 2201] Federally Enforceable Through Title V Permit
10. This permit allows for a specified percentage of allowed leaking components as defined in this permit to be discovered within prescribed time frames under Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
11. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
12. BACT Requirement Any leak greater than 500 ppmv for pump seals and compressor seals and 100 ppmv for valves and connectors, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21 or leaking at a rate of greater than 3 drops of liquid per minute, shall be repaired in a manner consistent with the procedures specified in Rule 4409 (adopted April 20, 2005). This requirement shall not apply to inaccessible or unsafe-to-access components as identified in the revised Operator Management Plan required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
13. VOC fugitive emissions from the components in gas service shall not exceed 6.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. VOC content of the non-condensable vapors shall not exceed 35% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Operator shall test and maintain records of VOC content of the non-condensable vapors no less than annually. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The VOC content by weight percent (wt. %) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases. [District Rule 1081] Federally Enforceable Through Title V Permit
17. Permittee shall comply with applicable monitoring, inspection, maintenance, recordkeeping, reporting, and leak requirements of 40 CFR Part 60 Subpart KKK and Rule 4409. [40 CFR Part 60 Subpart KKK, District Rule 2201, and District Rule 4409] Federally Enforceable Through Title V Permit
18. Monthly average daily throughput shall not exceed 197 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. True Vapor Pressure (TVP) of any organic liquid introduced to or stored in the sump shall not exceed 1.9 psia. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

20. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
21. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
22. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
23. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products. [District Rule 4623] Federally Enforceable Through Title V Permit
24. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
25. The permittee shall maintain monthly records of the tank throughput and TVP of the organic liquid introduced or stored in the sump. [District Rule 1070] Federally Enforceable Through Title V Permit
26. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-9168-19-2

**ISSUANCE DATE:** 05/13/2021

**LEGAL OWNER OR OPERATOR:** ELK HILLS POWER LLC

**MAILING ADDRESS:**  
35R GAS PLANT  
4026 SKYLINE ROAD  
TUPMAN, CA 93276

**LOCATION:**  
35R GAS PLANT  
SECTION SE35, T30S, R23E  
TUPMAN, CA

**SECTION:** NW35 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 300 BBL AMINE STORAGE TANK SERVED BY VAPOR CONTROL SYSTEM: INCREASE FUGITIVE VOC EMISSION LIMIT

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. ATC S-9168-1-2 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit

### CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO



Brian Clements, Director of Permit Services

S-9168-19-2 : May 13 2021 2:06PM -- RAMIREZH : Joint Inspection NOT Required

5. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using screening value emissions factors of CARB/CAPCOA "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities" included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). Emissions shall be calculated after each quarterly inspection period as required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
6. This permit allows for a specified percentage of allowed leaking components as defined in this permit to be discovered within prescribed time frames under Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
7. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. A gas or liquid leak is a violation of this permit and shall be reported as a deviation. [District Rule 2201] Federally Enforceable Through Title V Permit
8. VOC fugitive emissions from the components in gas service on tank shall not exceed 6.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. VOC content of the non-condensable TVR vapors shall not exceed 37% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Operator shall test and maintain records of VOC content of the non-condensable TVR vapors no less than annually. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The VOC content by weight percent (wt. %) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases. [District Rule 1081] Federally Enforceable Through Title V Permit
12. Storage tank and all piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
13. Gas-leak concentration shall be determined by EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Storage tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in gas-tight condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 99% by weight as determined by the test method specified in Section 6.4.7. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
15. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
16. Any tank gauging or sampling device on storage tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
17. Operator shall visually inspect storage tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shell and roof of the uninsulated tank for structural integrity annually. [District Rules 2210 and 4623] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

18. Upon detection of a liquid leak from storage tank, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
19. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take on of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
20. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
21. If a component type for storage tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
22. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
23. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]



# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-9168-20-2

**ISSUANCE DATE:** 05/13/2021

**LEGAL OWNER OR OPERATOR:** ELK HILLS POWER LLC

**MAILING ADDRESS:**  
35R GAS PLANT  
4026 SKYLINE ROAD  
TUPMAN, CA 93276

**LOCATION:**  
35R GAS PLANT  
SECTION SE35, T30S, R23E  
TUPMAN, CA

**SECTION:** NW35 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 300 BBL FRESH WATER TANK SERVED BY VAPOR CONTROL SYSTEM: INCREASE FUGITIVE VOC EMISSION LIMIT

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. ATC S-9168-1-2 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit

### CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO



Brian Clements, Director of Permit Services

S-9168-20-2 : May 13 2021 2:06PM -- RAMIREZH : Joint Inspection NOT Required

5. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using screening value emissions factors of CARB/CAPCOA "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities" included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). Emissions shall be calculated after each quarterly inspection period as required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
6. This permit allows for a specified percentage of allowed leaking components as defined in this permit to be discovered within prescribed time frames under Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
7. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
8. VOC fugitive emissions from the components in gas service shall not exceed 3.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. VOC content of the non-condensable vapors shall not exceed 35% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Operator shall test and maintain records of VOC content of the non-condensable vapors no less than annually. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The VOC content by weight percent (wt. %) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases. [District Rule 1081] Federally Enforceable Through Title V Permit
12. Permittee shall comply with applicable monitoring, inspection, maintenance, recordkeeping, reporting, and leak requirements of 40 CFR Part 60 Subpart KKK and Rule 4409. [40 CFR Part 60 Subpart KKK and District Rule 4409] Federally Enforceable Through Title V Permit
13. Storage tank and all piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
14. Gas-leak concentration shall be determined by EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Storage tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in gas-tight condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 99% by weight as determined by the test method specified in Section 6.4.7. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
16. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
17. Any tank gauging or sampling device on storage tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
18. Operator shall visually inspect storage tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shell and roof of the uninsulated tank for structural integrity annually. [District Rules 2210 and 4623] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. Upon detection of a liquid leak from storage tank, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
20. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take on of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
21. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
22. If a component type for storage tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
23. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
24. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-9168-21-2

**ISSUANCE DATE:** 05/13/2021

**LEGAL OWNER OR OPERATOR:** ELK HILLS POWER LLC

**MAILING ADDRESS:**  
35R GAS PLANT  
4026 SKYLINE ROAD  
TUPMAN, CA 93276

**LOCATION:**  
35R GAS PLANT  
SECTION SE35, T30S, R23E  
TUPMAN, CA

**SECTION:** NW35 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 500 BBL PRODUCED WATER STORAGE TANK SERVED BY VAPOR CONTROL SYSTEM:  
INCREASE FUGITIVE VOC EMISSION LIMIT

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. ATC S-9168-1-2 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

### CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO



Brian Clements, Director of Permit Services

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6. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using screening value emissions factors of CARB/CAPCOA "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities" included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). Emissions shall be calculated after each quarterly inspection period as required by Rule 4409. [District Rule 2201] Federally Enforceable Through Title V Permit
7. This permit allows for a specified percentage of allowed leaking components as defined in this permit to be discovered within prescribed time frames under Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
8. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
9. VOC fugitive emissions from the components in gas service shall not exceed 3.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. VOC content of the non-condensable vapors shall not exceed 35% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Operator shall test VOC content of the non-condensable vapors no less than annually. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The VOC content by weight percent (wt. %) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases. [District Rule 1081] Federally Enforceable Through Title V Permit
13. Permittee shall comply with applicable monitoring, inspection, maintenance, recordkeeping, reporting, and leak requirements of 40 CFR Part 60 Subpart KKK and Rule 4409. [40 CFR Part 60 Subpart KKK and District Rule 4409] Federally Enforceable Through Title V Permit
14. Gas-leak concentration shall be determined by EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Storage tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in gas-tight condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 99% by weight as determined by the test method specified in Section 6.4.7. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
16. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
17. Any tank gauging or sampling device on storage tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
18. Operator shall visually inspect storage tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shell and roof of the uninsulated tank for structural integrity annually. [District Rules 2210 and 4623] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. Upon detection of a liquid leak from storage tank, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
20. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take on of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
21. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
22. If a component type for storage tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
23. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
24. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-9168-22-2

**ISSUANCE DATE:** 05/13/2021

**LEGAL OWNER OR OPERATOR:** ELK HILLS POWER LLC

**MAILING ADDRESS:**  
35R GAS PLANT  
4026 SKYLINE ROAD  
TUPMAN, CA 93276

**LOCATION:**  
35R GAS PLANT  
SECTION SE35, T30S, R23E  
TUPMAN, CA

**SECTION:** NW35 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 500 BBL SLOP OIL TANK CONNECTED TO EXISTING GAS GATHERING SYSTEM: INCREASE FUGITIVE VOC EMISSION LIMIT

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. ATC S-9168-1-2 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Storage tank shall be equipped with a vapor recovery system consisting of a closed vent system that routes all VOCs from the storage tank to a field gas gathering system. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

### CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO



Brian Clements, Director of Permit Services

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6. Storage tank and all piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using screening value emissions factors of CARB/CAPCOA "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities" included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). Emissions shall be calculated after each quarterly inspection period as required by Rule 4409. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This permit allows for a specified percentage of allowed leaking components as defined in this permit to be discovered within prescribed time frames under Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
9. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
10. VOC fugitive emissions from tank and from components in piping from tank to vapor control system trunk line shall not exceed 6.6 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. VOC fugitive emissions from tank vapor control system shall not exceed 2.6 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. VOC content of the non-condensable vapors shall not exceed 35% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Operator shall test VOC content of the non-condensable vapors no less than annually. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The VOC content by weight percent (wt. %) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases. [District Rule 1081] Federally Enforceable Through Title V Permit
15. Gas-leak concentration shall be determined by EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Permittee shall comply with applicable monitoring, inspection, maintenance, recordkeeping, reporting, and leak requirements of Rule 4409. [District Rule 4409] Federally Enforceable Through Title V Permit
17. Any tank gauging or sampling device on storage tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
18. Operator shall visually inspect storage tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shell and roof of the uninsulated tank for structural integrity annually. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
19. Upon detection of a liquid leak from storage tank, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
20. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 parts per million by volume (ppmv) for the tank measured in accordance with EPA Method 21, operator shall take on of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE



21. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
22. If a component type for storage tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
23. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
24. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-9168-24-2

**ISSUANCE DATE:** 05/13/2021

**LEGAL OWNER OR OPERATOR:** ELK HILLS POWER LLC

**MAILING ADDRESS:**  
35R GAS PLANT  
4026 SKYLINE ROAD  
TUPMAN, CA 93276

**LOCATION:**  
35R GAS PLANT  
SECTION SE35, T30S, R23E  
TUPMAN, CA

**SECTION:** NW35 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF O2 REMOVAL SYSTEM WITH 19.5 MMBTU/HR O2 HEATER WITH COEN C-RMB RAPID MIX ULTRA LOW NOX BURNER (OR EQUIVALENT) , OXYGEN REMOVAL REACTOR, OXYGEN REMOVAL DISCHARGE COOLER AND SCRUBBER AND O2 REMOVAL COOLER: INCREASE FUGITIVE VOC EMISSION LIMIT

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. ATC S-9168-1-2 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Source testing to measure NOx and CO emissions from this unit shall be conducted within 60 days of initial start-up. [District Rule 2080] Federally Enforceable Through Title V Permit
5. The fuel line shall be physically disconnected from the unit. [District Rule 2080] Federally Enforceable Through Title V Permit

### CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO



Brian Clements, Director of Permit Services

S-9168-24-2 : May 13 2021 2:06PM -- RAMIREZH : Joint Inspection NOT Required

6. While dormant, normal source testing shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
7. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
9. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
10. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using screening value emissions factors of CARB/CAPCOA "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities" included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). [District Rule 2201] Federally Enforceable Through Title V Permit
11. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
12. BACT Requirement Any leak greater than 500 ppmv for pump seals and compressor seals and 100 ppmv for valves and connectors, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21 or leaking at a rate of greater than 3 drops of liquid per minute, shall be repaired in a manner consistent with the procedures specified in Rule 4409 (adopted April 20, 2005). This requirement shall not apply to inaccessible or unsafe-to-access components as identified in the revised Operator Management Plan required by Rule 4409. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
13. VOC fugitive emissions from the components in gas service on tank shall not exceed 4.8 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. VOC content of the non-condensable TVR vapors shall not exceed 35% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Operator shall test and maintain records of VOC content of the non-condensable TVR vapors no less than annually. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The VOC content by weight percent (wt. %) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases. [District Rule 1081] Federally Enforceable Through Title V Permit
17. O2 removal heater shall only be fired on PUC-quality natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emissions from the natural gas-fired unit shall not exceed any of the following limits: 6 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.007 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, 50 ppmvd CO @ 3% O<sub>2</sub> or 0.037 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

20. Source testing to measure NO<sub>x</sub> and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
23. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
26. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
28. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
29. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
30. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
31. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

32. Permittee shall comply with applicable monitoring, inspection, maintenance, and recordkeeping, and reporting requirements of 40 CFR Part 60 Subpart KKK and Rule 4409. [40 CFR Part 60 Subpart KKK, District Rule 2201, and District Rule 4409] Federally Enforceable Through Title V Permit
33. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 40 CFR 60.48c(i)] Federally Enforceable Through Title V Permit