

July 12, 2021

Mr. Jason Goklaney
Sentinel Peak Resources CA, LLC
1200 Discovery Drive, Suite 100
Bakersfield, CA 93309

Re: Final - Authorities to Construct / Certificates of Conformity (Significant Mod)
Facility Number: S-1372
Project Number: S-1203797

Dear Mr. Goklaney:

The Air Pollution Control Officer has issued Authorities to Construct (ATCs) S-1372-16-27, '-100-38, '-127-28, and '-317-18 with Certificates of Conformity to Sentinel Peak Resources CA, LLC in western Kern County. The project modified two steam generators. 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).

Notice of the District's preliminary decision to issue the ATCs was posted on May 4, 2021. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on May 5, 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.

Samir Sheikh
Executive Director/Air Pollution Control Officer

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

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

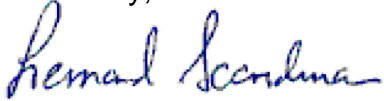
Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: (661) 392-5500 FAX: (661) 392-5585

July 12, 2021

Mr. Jason Goklaney
Page 2

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

Sincerely,

A handwritten signature in blue ink that reads "Leonard Scandura". The signature is written in a cursive style with a large initial 'L'.

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-1372
SENTINEL PEAK RESOURCES CA LLC
1200 DISCOVERY DR, STE 500
BAKERSFIELD, CA 93309

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 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.

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

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

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1372-16-27

ISSUANCE DATE: 07/12/2021

LEGAL OWNER OR OPERATOR: SENTINEL PEAK RESOURCES CA LLC

MAILING ADDRESS: 1200 DISCOVERY DR, STE 500
BAKERSFIELD, CA 93309

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
CA

SECTION: NW 6 **TOWNSHIP:** 30S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS/TEOR GAS-FIRED STEAM GENERATOR (#12) (DIS# 44519-76) EQUIPPED WITH A NORTH AMERICAN GLE ULTRA LOW NOX BURNER, FGR AND O2 CONTROLLER AND EXHAUST GAS SOX SCRUBBER W/ESP SHARED WITH S-1372-127 AND S1372-317 (MCKITTRICK FRONT LEASE): ALLOW SIMULTANEOUS COMBUSTION OF TEOR GAS IN '-16 AND '-317, REVISE SOX EMISSIONS LIMIT TO 180 LB/DAY, LOWER CO EMISSIONS FACTOR

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 - 241 lb, 2nd quarter - 241 lb, 3rd quarter - 241 lb, and fourth quarter - 241 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [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-1372-16-27 : Jul 12 2021 4:29PM -- DAVIDSOS : Joint Inspection NOT Required

4. ERC Certificate Number N-1553-1 (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
5. ATC shall be implemented concurrently with or subsequent to ATC S-1372-127-27. [District Rule 2201] Federally Enforceable Through Title V Permit
6. This steam generator is approved to operate at the following locations: Sec. 23, T31S, R22E, NW 1/4 Sec. 6, T30S, R22E, and NW 1/4 Sec. 10, T29S, R21E [District Rule 2201] Federally Enforceable Through Title V Permit
7. The permittee shall notify the District Compliance Division of each location at which the operation is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 2201] Federally Enforceable Through Title V Permit
8. No less than 0.5 miles of roadway shall be paved and maintained in good repair. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The steam generator shall be equipped with piping from TEOR operation S-1372-100 to fuel gas inlet on burner when operating at Sec. 23, T31S, R22E. [District Rule 2201] Federally Enforceable Through Title V Permit
10. SO_x (as SO₂) emissions from steam generator shall not exceed 180.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total casing gas sulfur oxide (SO_x as SO₂) emissions shall not exceed 1193.5 lb/day for the following steam generators and standby flare: S-1372-13 (#16), S-1372-16 (#12), S-1372-24 (#20), and S-1372-76. SO_x as SO₂ emissions from '-16 shall be calculated as $[(\text{mscf combusted in '-16})/(\text{combined mscf combusted in '-16, '-127, and '-317})] \times \text{total SO}_x \text{ emissions from scrubber/ESP '-127}$. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Emissions shall not exceed any of the following: 27 lb NO_x/day, 4,380 lb NO_x/year. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Duration of start-up and shutdown shall not exceed 2 hours each per occurrence. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
14. Except during startup and shutdown emissions shall not exceed any of the following: PM₁₀: 0.014 lb/MMBtu; NO_x (as NO₂): 0.008 lb/MMBtu or 7 ppmv @ 3% O₂; VOC: 0.0012 lb/MMBtu; or CO: 25 ppmv @ 3% O₂. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. Compliance with 95% by weight sulfur removal efficiency requirement shall be conducted annually. [District Rule 4320] Federally Enforceable Through Title V Permit
16. Exhaust stack shall be equipped with adequate provisions facilitating the collection of gas samples consistent with EPA Test Methods. [District Rule 1081] Federally Enforceable Through Title V Permit
17. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. 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

18. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. The portable analyzer shall be calibrated prior to each use with a two-point calibration method (zero and span). Calibration shall be performed with certified calibration gases. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
22. Source testing to measure NO_x and CO emissions from this unit 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
23. 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
24. 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
25. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
26. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate, no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. NO_x 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
29. 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

CONDITIONS CONTINUE ON NEXT PAGE

30. Stack gas oxygen (O₂) 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
31. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320] Federally Enforceable Through Title V Permit
32. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
33. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
34. In lieu of the annual source testing requirements of Rule 4320, compliance with the applicable emission limits may be demonstrated by submittal of annual emissions test results to the District from a unit or units that represents a group of units, provided that all of the conditions in Section 6.3.2 are met and documented. [District Rule 4320] Federally Enforceable Through Title V Permit
35. Annual test results submitted to the District from unit(s) representing a group of units may be used to demonstrate compliance with NO_x and CO limits of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NO_x or CO emissions limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 4305, 6.3.2, 4306, 4320, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
36. The following conditions must be met for representative unit(s) to be used to demonstrate compliance for NO_x and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 4305, 6.3.2, 4306, 4320, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
37. All units in a group for which representative units are source tested to demonstrate compliance for NO_x and CO limits of this permit shall have received the same maintenance and tune-up procedures as the representative unit(s). These tune-up procedures shall be completed according to District Rule 4304 (Adopted October 19, 1995) and tune-up test results shall show comparable results for each unit in the group. Records shall be maintained for the each unit of the group including all preventative and corrective maintenance work done. [District Rules 4305, 6.3.2, 4306, 6.3.2, 4320, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
38. All units in a group for which representative units are source tested to demonstrate compliance for NO_x and CO limits of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type (e.g. from natural gas to oil) then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 4305, 6.3.2, 4306, 6.3.2, 4320, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
39. The number of representative units source tested to demonstrate compliance for NO_x and CO limits shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rules 4305, 6.3.2, 4306, 6.3.2, 4320, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
40. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be quarterly. If a quarterly fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
41. When complying with SO_x emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6B; or Method 8; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

42. If the unit is fired on noncertified gaseous fuel and compliance with SO_x emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3246, D 4084, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
43. If fuel analysis is used to demonstrate compliance with conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 2520, 9.3.2; 4305, 6.2; 4306, 6.2; and 4320, 6.2] Federally Enforceable Through Title V Permit
44. Copies of all fuel invoices, gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
45. Permittee shall maintain daily records of SO_x (as SO₂) emissions (lb/day) from steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
46. Permittee shall maintain records of volume of fuel gas burned and TEOR gas incinerated, fuel gas and TEOR gas sulfur content, and such records shall be retained on site for a period of at least five years and shall be made readily available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
47. Sulfur compound emissions shall not exceed 0.11 lb of sulfur per million BTU. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas; multiplying the reported sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by a combination of source testing for sulfur compounds and fuel analysis. [District Rule 4406]
48. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall do one of the following: fire the unit only on PUC or FERC regulated natural gas; or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels; or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rules 4801 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
49. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1372-100-38

ISSUANCE DATE: 07/12/2021

LEGAL OWNER OR OPERATOR: SENTINEL PEAK RESOURCES CA LLC

MAILING ADDRESS: 1200 DISCOVERY DR, STE 500
BAKERSFIELD, CA 93309

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
CA

SECTION: 06 **TOWNSHIP:** 30S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

MODIFICATION OF TEOR OPERATION WITH WELL CASING COLLECTION SYSTEM WITH VAPOR PIPING TO UNIT S-1372-99 SERVING 933 STEAM ENHANCED WELLS WITH 3-PHASE SEPARATORS, STANDBY FLARE, SLUG CATCHER, SCRUBBERS, HEAT EXCHANGERS, COMPRESSORS, PUMPS, SULFA CHECK AND LIQUID SULFUR REMOVAL SYSTEMS (GAMBLE/MCKITTRICK FRONT): ADD REFERENCE TO '-16 , 127, AND '-317 FOR COMBUSTION OF TEOR VAPORS

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 shall be implemented concurrently with or subsequent to ATCs S-1327-16-27, '-100-34, '-100-35, '-100-36, '-100-37, '-100-39, '-127-28, and '-317-18 . [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operation shall include the following equipment: 933 steam enhanced wells, well vent vapor collection system, standby flare, slug catchers, heat exchangers, compressors, pumps, vapor piping, dry fuel gas sulfur scrubbing system and liquid sulfur removal systems, tanks and 3-phase separators. [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-1372-100-38 : Jul 12 2021 4:29PM -- DAVIDSOS : Joint Inspection NOT Required

5. Operation shall include vapor piping from tanks S-1372-128, -209, -220, -323, -405, -412, S-1641-34, -35, -36, and -37 to vapor control system. [District Rule 2201] Federally Enforceable Through Title V Permit
6. At least one sulfur removal system shall be operated at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
7. There shall be no leaks exceeding 10,000 ppmv from fugitive emissions components associated with liquid sulfur removal system. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Collected condensate shall be discharged into production pipeline. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Flare S-1372-100 shall only be used to incinerate TEOR vapors when one or more of steam generators S-1372-1, -2, -4, -16, -127, and -317 are not in operation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Flare shall only use PUC quality natural gas as auxiliary fuel. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Flare shall be designed for smokeless operation, with no visible emissions in excess of 5% opacity. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The flare shall be operated according to the manufacturer's specifications, a copy of which shall be maintained on site. [District Rule 2520] Federally Enforceable Through Title V Permit
13. The flare in this permit shall be inspected every two weeks while in operation for visible emissions. If visible emissions are observed, corrective action shall be taken. If visible emissions continue, an EPA method 9 test shall be conducted within 72 hours. [District Rule 2520] Federally Enforceable Through Title V Permit
14. Flare shall comply with all of the applicable requirements of Rule 4311. [District Rule 4311] Federally Enforceable Through Title V Permit
15. The flame shall be present at all times when combustible gases are vented through the flare. [District Rule 4311] Federally Enforceable Through Title V Permit
16. The flare outlet shall be equipped with an automatic ignition system, or, shall operate with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rule 4311] Federally Enforceable Through Title V Permit
17. Except for flares equipped with a flow-sensing ignition system, a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present shall be installed and operated. [District Rule 4311] Federally Enforceable Through Title V Permit
18. Flares using flow-sensing automatic ignition systems and not using a continuous flame pilot shall use purge gas for purging. [District Rule 4311] Federally Enforceable Through Title V Permit
19. Open flares (air-assisted, steam-assisted, or non-assisted) in which the flare gas pressure is less than 5 psig shall be operated in such a manner that meets the provisions of 40 CFR 60.18. [District Rule 4311] Federally Enforceable Through Title V Permit
20. Flaring is prohibited unless it is consistent with an approved flare minimization plan (FMP), pursuant to Rule 4311, Section 6.5, and all commitments listed in that plan have been met. This standard shall not apply if the APCO determines that the flaring is caused by an emergency as defined by Section 3.7 and is necessary to prevent an accident, hazard or release of vent gas directly to the atmosphere [District Rule 4311] Federally Enforceable Through Title V Permit
21. The operator of a flare subject to flare minimization requirements pursuant to Section 5.8 shall monitor the vent gas flow to the flare with a flow measuring device or other parameters as specified in the Permit to Operate. The operator shall maintain records pursuant to Section 6.1.7. Flares that the operator can verify, based on permit conditions, are not capable of producing reportable flare events pursuant to Section 6.2.2 shall not be required to monitor vent gas flow to the flare. [District Rule 4311] Federally Enforceable Through Title V Permit

22. The following records shall be maintained, retained on-site for a minimum of five years, and made available to the APCO, ARB, and EPA upon request: 1) A copy of the compliance determination conducted pursuant to Section 6.4.1, 2) For flares used during an emergency, record of the duration of flare operation, amount of gas burned, and the nature of the emergency situation, 3) A copy of the approved flare minimization plan pursuant to Section 6.5, 4) On and after July 1, 2012, where applicable, a copy of annual reports submitted to the APCO pursuant to Section 6.2, and 5) Where applicable, monitoring data collected pursuant to Sections 5.10. [District Rule 4311] Federally Enforceable Through Title V Permit
23. The operator of a flare subject to flare minimization plans pursuant to Section 5.8 of Rule 4311 shall notify the APCO of an unplanned flaring event within 24 hours after the start of the next business day or within 24 hours of their discovery, whichever occurs first. The notification shall include the flare source identification, the start date and time, and the end date and time. [District Rule 4311] Federally Enforceable Through Title V Permit
24. Effective on and after July 1, 2012, and annually thereafter, the operator of a flare subject to flare minimization plans pursuant to Section 5.8 shall submit an annual report to the APCO that summarizes all Reportable Flaring Events as defined in Section 3.0 that occurred during the previous 12 month period. The report shall be submitted within 30 days following the end of the twelve month period of the previous year. The report shall include, but is not limited to all of the following: 1) The results of an investigation to determine the primary cause and contributing factors of the flaring event; 2) Any prevention measures considered or implemented to prevent recurrence together with a justification for rejecting any measures that were considered but not implemented; 3) If appropriate, an explanation of why the flaring was an emergency and necessary to prevent accident, hazard or release of vent gas to the atmosphere, or where, due to a regulatory mandate to vent a flare, it cannot be recovered, treated and used as a fuel gas at the facility; and 4) The date, time, and duration of the flaring event. [District Rule 4311] Federally Enforceable Through Title V Permit
25. Effective on and after July 1, 2012, and annually thereafter, the operator of a flare subject to flare monitoring requirements pursuant to Rule 4311, Sections 5.10, 6.6, 6.7, 6.8, 6.9, and 6.10, as appropriate, shall submit an annual report to the APCO within 30 days following the end of each 12 month period. The report shall include the following: 1) The total volumetric flow of vent gas in standard cubic feet for each day, 2) Hydrogen sulfide content, methane content, and hydrocarbon content of vent gas composition pursuant to Section 6.6, 3) If vent gas composition is monitored by a continuous analyzer or analyzers pursuant to Section 5.11, average total hydrocarbon content by volume, average methane content by volume, and depending upon the analytical method used pursuant to Section 6.3.4, total reduced sulfur content by volume or hydrogen sulfide content by volume of vent gas flared for each hour of the month, 4) If the flow monitor used pursuant to Section 5.10 measures molecular weight, the average molecular weight for each hour of each month, 5) For any pilot and purge gas used, the type of gas used, the volumetric flow for each day and for each month, and the means used to determine flow, 6) Flare monitoring system downtime periods, including dates and times, 7) For each day and for each month provide calculated sulfur dioxide emissions, and 8) A flow verification report for each flare subject to this rule. The flow verification report shall include flow verification testing pursuant to Section 6.3.5. [District Rule 4311] Federally Enforceable Through Title V Permit
26. Total hydrocarbon content and methane content of vent gas shall be determined using ASTM Method D 1945-96, ASTM Method UOP 539-97, EPA Method 18, or EPA Method 25A or 25B. Hydrogen sulfide content of vent gas shall be determined using ASTM Method D 1945-96, ASTM Method UOP 539-97, ASTM Method D 4084-94, or ASTM Method D 4810-88. [District Rule 4311] Federally Enforceable Through Title V Permit
27. Upon request, the operator of flares that are subject to Section 5.6 shall make available to the APCO the compliance determination records that demonstrate compliance with the provisions of 40 CFR 60.18, (c)(3) through (c)(5). [District Rule 4311] Federally Enforceable Through Title V Permit
28. Operator shall monitor vent gas composition using one of the five methods pursuant to Section 6.6.1 through Section 6.6.5, as appropriate. [District Rule 4311] Federally Enforceable Through Title V Permit
29. Operator shall monitor the volumetric flows of purge and pilot gases with flow measuring devices or other parameters as specified on the Permit to Operate so that volumetric flows of pilot and purge gas may be calculated based on pilot design and the parameters monitored. [District Rule 4311] Federally Enforceable Through Title V Permit
30. All of the general monitoring provisions of Section 6.9, as applicable, shall be met. [District Rule 4311] Federally Enforceable Through Title V Permit

31. Operator shall install and maintain equipment that records a real-time digital image of the flare and flame at a frame rate of no less than one frame per minute. The recorded image of the flare shall be of sufficient size, contrast, and resolution to be readily apparent in the overall image or frame. The image shall include an embedded date and time stamp. The equipment shall archive the images for each 24-hour period. In lieu of video monitoring the operator may use an alternative monitoring method that provides data to verify date, time, vent gas flow, and duration of flaring events. [District Rule 4311] Federally Enforceable Through Title V Permit
32. Vapors from this well vent vapor control system shall be incinerated in steam generators S-1372-1, -2, -4, -16, -30, -32, -33, -127, -317, -334 or standby flare and/or injected into DOGGR approved gas injection wells. [District Rule 2201] Federally Enforceable Through Title V Permit
33. Total sulfur oxide (SOx as SO2) emissions shall not exceed 1,075.2 lb/day for the following steam generators: S-1372-1, -2, -4, '127, '317, and standby flare. [District Rule 2201] Federally Enforceable Through Title V Permit
34. Fugitive emissions from vapor collection and control system shall not exceed 239.6 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
35. There shall be no more than 30 gas leaks. [District Rule 2201] Federally Enforceable Through Title V Permit
36. Permittee shall maintain accurate records of well casing vapor H2S concentration (periodic sampling of no less than once per month), daily volume of casing vapor incinerated, and calculated daily SO2 emissions from S-1372-1, '-2, and '-4. [District Rules 1070 and 2520] Federally Enforceable Through Title V Permit
37. Permittee shall maintain with the permit a current listing of all steam enhanced wells connected to the casing vent control system and shall make such listing readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
38. Permittee shall maintain accurate component count for TEOR operation according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors. Permittee shall update such records when new components are installed. [District Rule 2201] Federally Enforceable Through Title V Permit
39. The following test method shall be used for fuel gas sulfur content - ASTM D3246 or double GC for H2S and mercaptans. [District Rule 2520] Federally Enforceable Through Title V Permit
40. All required source testing shall conform to the compliance testing procedures described in District Rule 1081(amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
41. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the emission control requirements of District Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
42. The inspection requirements of Section 5.4.1 through Section 5.4.7 of Rule 4401 shall not apply to components exclusively handling gas/vapor or liquid with a VOC content of ten percent by weight (10%) or less, as determined by the test methods in Section 6.3.4 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
43. Gas and liquid leaks are as defined in Section 3.20 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
44. An operator shall not operate a steam-enhanced crude oil production well unless the operator complies with either of the following requirements: The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401, the well vent may be temporarily opened during periods of attended service or repair of the well provided such activity is done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere, or the steam-enhanced crude oil production well vent is open and the well vent is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit

45. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of an open-ended line or a valve located at the end of the line that is not sealed with a blind flange, plug, cap, or a second closed valve that is not closed at all times, except during attended operations as defined by Section 5.2.2.1 of Rule 4401 requiring process fluid flow through the open-ended lines, a component with a major liquid leak, or a component with a gas leak greater than 50,000 ppmv. [District Rule 4401] Federally Enforceable Through Title V Permit
46. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of any combination of components with minor liquid leaks, minor gas leaks, or a gas leaks greater than 10,000 ppmv up to 50,000 ppmv that totals more than number of leaks allowed by Table 2 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
47. An operator shall not use any component with a leak as defined in Section 3.0 of Rule 4401, or that is found to be in violation of the provisions of Section 5.2.2 of Rule 4401. However, components that were found leaking may be used provided such leaking components have been identified with a tag for repair, are repaired, or awaiting re-inspection after being repaired within the applicable time frame specified in Section 5.5 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
48. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401] Federally Enforceable Through Title V Permit
49. An operator shall comply with the requirements of Section 6.7 of Rule 4401 if there is any change in the description of major components or critical components. [District Rule 4401] Federally Enforceable Through Title V Permit
50. Except for pipes and unsafe-to-monitor components, an operator shall inspect all other components pursuant to the requirements of Section 6.3.3 of Rule 4401 at least once every year. [District Rule 4401] Federally Enforceable Through Title V Permit
51. An operator shall visually inspect all pipes at least once every year. Any visual inspection of pipes that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected within 24 hours after detecting the leak. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 3 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
52. In addition to the inspections required by Section 5.4.1 of Rule 4401, an operator shall inspect for leaks all accessible operating pumps, compressors, and PRDs in service as follows: An operator shall audio-visually (by hearing and by sight) inspect for leaks all accessible operating pumps, compressors, and PRDs in service at least once each calendar week. Any audio-visual inspection of an accessible operating pump, compressor, and PRD performed by an operator that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected not later than 24 hours after conducting the audio-visual inspection. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 3 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
53. In addition to the inspections required by Sections 5.4.1, 5.4.2 and 5.4.3 of Rule 4401, operator shall perform the following: initially inspect a PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the discovery of the release, re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection, inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. Except for PRDs subject to the requirements of Section 5.4.4.1 of Rule 4401, an operator shall inspect a component that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. [District Rule 4401] Federally Enforceable Through Title V Permit
54. An operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401] Federally Enforceable Through Title V Permit
55. District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. [District Rule 4401] Federally Enforceable Through Title V Permit

56. An operator shall affix a readily visible weatherproof tag to a leaking component upon detection of the leak and shall include the following information on the tag: date and time of leak detection, date and time of leak measurement, for a gaseous leak, the leak concentration in ppmv, for a liquid leak, whether it is a major liquid leak or a minor liquid leak, whether the component is an essential component, an unsafe-to monitor component, or a critical component. [District Rule 4401] Federally Enforceable Through Title V Permit
57. An operator shall keep the tag affixed to the component until an operator has met all of the following conditions: repaired or replaced the leaking component, re-inspected the component using the test method in Section 6.3.3, and the component is found to be in compliance with the requirements of this rule. [District Rule 4401] Federally Enforceable Through Title V Permit
58. An operator shall minimize a component leak in order to stop or reduce leakage to the atmosphere immediately to the extent possible, but not later than one (1) hour after detection of the leak. [District Rule 4401] Federally Enforceable Through Title V Permit
59. Except for leaking critical components or leaking essential components subject to the requirements of Section 5.5.7 of Rule 4401, if an operator has minimized a leak but the leak still exceeds the applicable leak limits as defined in Section 3.0 of Rule 4401, an operator shall comply with at least one of the following requirements as soon as practicable but not later than the time period specified in Table 3 of Rule 4401: Repair or replace the leaking component; or vent the leaking component to a VOC collection and control system as defined in Section 3.0 of Rule 4401, or remove the leaking component from operation. [District Rule 4401] Federally Enforceable Through Title V Permit
60. The repair period in calendar days shall not exceed 14 days for minor gas leaks, 5 days for major gas leaks less than or equal to 50,000 ppmv, 2 days for gas leak greater than 50,000 ppmv, 3 days for minor liquid leaks, 2 days for major liquid leaks. [District Rule 4401] Federally Enforceable Through Title V Permit
61. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period specified in Table 3 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
62. The time of the initial leak detection shall be the start of the repair period specified in Table 3 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
63. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401] Federally Enforceable Through Title V Permit
64. The operator of any steam-enhanced crude oil production well shall maintain records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401] Federally Enforceable Through Title V Permit
65. An operator of any steam-enhanced crude oil production well shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
66. Operator of any steam-enhanced crude oil production well shall keep an inspection log maintained pursuant to Section 6.4 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
67. Records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, instrument reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration shall be maintained. [District Rule 4401] Federally Enforceable Through Title V Permit
68. An operator shall maintain copies at the facility of the training records of the training program operated pursuant to Section 6.5 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
69. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

70. Operator shall keep a list of all gauge tanks, as defined in Section 3.17 of Rule 4401. The list shall contain the size, identification number, the location of each gauge tank and specify whether the gauge tank is upstream of all front line production equipment. [District Rule 4401] Federally Enforceable Through Title V Permit
71. The results of gauge tank TVP testing conducted pursuant to Section 6.2.3 shall be submitted to the APCO within 60 days after the completion of the testing. [District Rule 4401] Federally Enforceable Through Title V Permit
72. An operator that discovers that a PRD has released shall record the date that the release was discovered, and the identity and location of the PRD that released. An operator shall submit such information recorded during the calendar year to the APCO no later than 60 days after the end of the calendar year. [District Rule 4401] Federally Enforceable Through Title V Permit
73. An operator shall source test annually all vapor collection and control systems used to control emissions from steam-enhanced crude oil production well vents to determine the control efficiency of the device(s) used for destruction or removal of VOC. Compliance testing shall be performed annually by source testers certified by ARB. Testing shall be performed during June, July, August, or September of each year if the system's control efficiency is dependent upon ambient air temperature. A process system as defined in Section 3.30 of Rule 4401 is not subject to compliance source testing requirements. [District Rule 4401] Federally Enforceable Through Title V Permit
74. If approved by EPA, ARB, and the APCO, an operator need not comply with the annual testing requirement of Section 6.2.1 if all uncondensed VOC emissions collected by a vapor collection are controlled by an internal combustion engine subject to Rule 4702, a combustion device subject to Rule 4320, 4307 or 4308, a flare subject to Rule 4311. [District Rule 4401] Federally Enforceable Through Title V Permit
75. An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.17 of Rule 4401: Conduct periodic TVP testing of each gauge tank at least once every 24 months during summer (July - September), and whenever there is a change in the source or type of produced fluid in the gauge tank. The TVP testing shall be conducted at the actual storage temperature of the produced fluid in the gauge tank using the applicable TVP test method specified in Section 6.4 of Rule 4623 (Storage of Organic Liquids). The operator shall submit the TVP testing results to the APCO as specified in Section 6.1.9 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
76. 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 Rule 4401] Federally Enforceable Through Title V Permit
77. VOC content shall be analyzed by using the latest revision of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be performed by using ARB Method 432. [District Rule 4401] Federally Enforceable Through Title V Permit
78. Leak inspection, other than audio-visual, and measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. Where safety is a concern, such as measuring leaks from compressor seals or pump seals when the shaft is rotating, a person shall measure leaks by placing the instrument probe inlet at a distance of one (1) centimeter or less from the surface of the component interface. [District Rule 4401] Federally Enforceable Through Title V Permit
79. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401] Federally Enforceable Through Title V Permit

80. Operator shall maintain an inspection log in which an operator records, at a minimum, all of the following information for each inspection performed: The total number of components inspected, total number and percentage of leaking components found by component type, location, type, and name or description of each leaking component and description of any unit where the leaking component is found, date of leak detection and the method of leak detection. For gaseous leaks, the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak. the date of repair, replacement, or removal from operation of leaking components, identify and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier, methods used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier, the date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced, the inspector's name, business mailing address, and business telephone number, date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401] Federally Enforceable Through Title V Permit
81. Permittee shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures, as necessary. [District Rule 4401] Federally Enforceable Through Title V Permit
82. In accordance with the approved Operator Management Plan (OMP), permittee shall meet all applicable operating, leak standards, inspection and re-inspection, leak repair, record keeping, and notification requirements of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
83. By January 30 of each year, permittee shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4401] Federally Enforceable Through Title V Permit
84. The crude oil production from wells associated with this permit unit shall not lie within 1000 feet of an air injection well used for in-situ combustion. [District Rule 4407] Federally Enforceable Through Title V Permit
85. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall do one of the following: fire the unit only on PUC or FERC regulated natural gas; or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels; or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rules 4801 and 2520] Federally Enforceable Through Title V Permit
86. The requirements of SJVUAPCD Rule 4407 (Adopted 5/19/94) and SJVUAPCD Rule 4801 (Adopted 12/17/92) do not apply to the well vents. For Rule 4801 applicability, well vent emissions are fugitive emissions not considered to come from a point source. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1372-127-28

ISSUANCE DATE: 07/12/2021

LEGAL OWNER OR OPERATOR: SENTINEL PEAK RESOURCES CA LLC

MAILING ADDRESS: 1200 DISCOVERY DR, STE 500
BAKERSFIELD, CA 93309

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
CA

SECTION: 06 **TOWNSHIP:** 30S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 62.5 MMBTU/HR NATURAL GAS/TEOR GAS-FIRED STEAM GENERATOR #43 EQUIPPED WITH A NORTH AMERICAN MODEL MAGNA-FLAME G-LE LOW NOX BURNER, FGR, O2 CONTROLLER, AND EXHAUST GAS SOX SCRUBBER W/ESP SHARED WITH S-1372-16 AND '317 (MCKITTRICK FRONT LEASE): LOWER CO 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. If continuous operation oxygen analyzer/controller is utilized, excess O2 shall be maintained between 0.5 and 4.0%. If not utilized, excess air shall be maintained at no less than 15%. [District Rule 2201] Federally Enforceable Through Title V Permit
4. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of gas combusted in the unit shall be installed, utilized and maintained for each fuel line. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
5. Exhaust from unit shall be directed only to SO2 scrubber/wet ESP authorized herein except when burning PUC quality natural gas exclusively. [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-1372-127-28 : Jul 12 2021 4:29PM -- DAVIDSOS : Joint Inspection NOT Required

6. Scrubber/wet ESP shall be in operation when combusting TEOR gas. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Vapors from TEOR operation, permit # S-1372-100 may be incinerated in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Except during start-up and shutdown, emissions from the steam generator shall not exceed any of the following limits: 9 ppmvd NO_x @ 3% O₂ or 0.011 lb-NO_x/MMBtu, 0.324 lb-SO_x/MMBtu, 0.008 lb-PM₁₀/MMBtu, 25 ppmvd CO @ 3% O₂ or 0.0185 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
9. During start-up and shutdown, emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NO_x @ 3% O₂ or 0.018 lb-NO_x/MMBtu, 0.324 lb-SO_x/MMBtu, 0.008 lb-PM₁₀/MMBtu, 25 ppmvd CO @ 3% O₂ or 0.0185 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306 and 4320] Federally Enforceable Through Title V Permit
11. Duration of startup and shutdown shall not exceed 2 hours each per occurrence and, combined, shall not exceed 4 hours per day. During startup or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of startup and shutdown periods [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
12. Daily records of start-up and shutdown durations and number of occurrences of each shall be maintained. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
13. Total sulfur oxide (SO_x as SO₂) emissions shall not exceed 1,075.2 lb/day from steam generators S-1372-1, '2, '4, '127, '317, and flare '100. [District Rule 2201] Federally Enforceable Through Title V Permit
14. All vapor recovery gas burned in this device shall first be treated by the scrubber/wet ESP so at least 95% by weight of the sulfur is removed. [District Rules 2201, 4301, 4320, 4406, and 4801] Federally Enforceable Through Title V Permit
15. Compliance with the 95% by weight sulfur removal efficiency shall be conducted at least once every twelve months. [District Rule 4320] Federally Enforceable Through Title V Permit
16. The SO_x emission control system efficiency shall be determined using the following equation: Percent Control Efficiency = [(CSO₂, inlet - CSO₂, outlet) / CSO₂, inlet] x 100, where "CSO₂, inlet" is equal to the concentration of SO_x (expressed as SO₂) at the inlet side of the SO_x emission control system (in lb/dscf) and "CSO₂, outlet" is equal to the concentration of SO_x (expressed as SO₂) at the outlet side of the SO_x emission control system (in lb/dscf). [District Rule 4320] Federally Enforceable Through Title V Permit
17. The total gas fired in this unit, on a monthly average, shall be less than 50% PUC quality natural gas, by volume. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet and no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet. PUC quality natural gas also means high methane gas of at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
18. The permittee shall maintain monthly records of the volume of PUC quality natural gas and the total gas fired in this unit. Permittee shall keep monthly records of the percentage by volume of PUC quality gas fired and indicate if the volume of PUC quality gas fired is less than 50%. [District Rule 4320] Federally Enforceable Through Title V Permit
19. Scrubber/wet ESP control efficiency shall not be less than 95% by weight sulfur compounds. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Scrubber liquor pH shall be maintained within the range demonstrated to achieve compliance with SO₂ emissions limit and control efficiency performance, and shall be continuously monitored. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

21. Scrubber mist eliminator shall be properly cleaned and maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The wet ESP's secondary DC voltage shall be monitored weekly to ensure it is operating between 35 to 50KV [District Rule 2201] Federally Enforceable Through Title V Permit
23. Scrubber recirculation liquor liquid to gas ratio shall be maintained at no less than that demonstrated to achieve compliance during source testing. [District Rule 2201] Federally Enforceable Through Title V Permit
24. When any unit connected to scrubber/wet ESP is burning TEOR gas, scrubber/wet ESP shall be operating and permittee shall demonstrate compliance with sulfur oxide emissions limit by stack source testing within 60 days of initial scrubbing date and annually thereafter unless no TEOR gas has been burned since the last scrubber performance source test. Sulfur removal efficiency of scrubber/wet ESP shall be demonstrated during initial stack source test and calculated with subsequent tests. Ongoing compliance with sulfur oxide emissions limit shall be by calculation using the scrubber liquid pH, the demonstrated sulfur removal efficiency, and the fuel gas sulfur content. Fuel gas sulfur content shall be obtained by sample analysis at least quarterly. [District Rule 2201] Federally Enforceable Through Title V Permit
25. When unit is operated without scrubber/wet ESP, permittee shall demonstrate compliance with the sulfur oxide emissions limit by analysis of the fuel gas sulfur content within 60 days of initiating operation without scrubber. Analyses, as approved by the APCO, provided by the gas supplier may be used to satisfy this requirement. [District Rule 2201] Federally Enforceable Through Title V Permit
26. When complying with SO_x emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Methods 6, 6B, 8, or ARB 100. When operating unscrubbed, a grab sample analysis by double GC performed in the laboratory and EPA Method 19 may be used to calculate SO_x emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every 36 months unless testing is required by scrubber operational mode change as noted above. Annual source testing shall resume if any test fails to show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Exhaust stack shall be equipped with adequate provisions facilitating the collection of gas samples consistent with EPA Test Methods. [District Rule 1081] Federally Enforceable Through Title V Permit
28. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
29. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of 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_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
32. The portable analyzer shall be calibrated prior to each use with a two-point calibration method (zero and span). Calibration shall be performed with certified calibration gases. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
33. Source testing to measure NO_x and CO emissions from this unit 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
34. 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
35. 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
36. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
37. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate, no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
38. 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
39. NO_x 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
40. 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
41. Stack gas oxygen (O₂) 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
42. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320] Federally Enforceable Through Title V Permit
43. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
44. 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
45. In lieu of the annual source testing requirements of Rule 4320, compliance with the applicable emission limits may be demonstrated by submittal of annual emissions test results to the District from a unit or units that represents a group of units, provided that all of the conditions in Section 6.3.2 are met and documented. [District Rule 4320] Federally Enforceable Through Title V Permit

46. Annual test results submitted to the District from unit(s) representing a group of units may be used to demonstrate compliance with NO_x and CO limits of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NO_x or CO emissions limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 4305, 6.3.2, 4306, 4320, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
47. The following conditions must be met for representative unit(s) to be used to demonstrate compliance for NO_x and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 4305, 6.3.2, 4306, 4320, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
48. All units in a group for which representative units are source tested to demonstrate compliance for NO_x and CO limits of this permit shall have received the same maintenance and tune-up procedures as the representative unit(s). These tune-up procedures shall be completed according to District Rule 4304 (Adopted October 19, 1995) and tune-up test results shall show comparable results for each unit in the group. Records shall be maintained for the each unit of the group including all preventative and corrective maintenance work done. [District Rules 4305, 6.3.2, 4306, 6.3.2, 4320, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
49. All units in a group for which representative units are source tested to demonstrate compliance for NO_x and CO limits of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type (e.g. from natural gas to oil) then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 4305, 6.3.2, 4306, 6.3.2, 4320, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
50. The number of representative units source tested to demonstrate compliance for NO_x and CO limits shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rules 4305, 6.3.2, 4306, 6.3.2, 4320, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
51. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be quarterly. If a quarterly fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
52. When complying with SO_x emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6B; or Method 8; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
53. If the unit is fired on noncertified gaseous fuel and compliance with SO_x emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3246, D 4084, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
54. If fuel analysis is used to demonstrate compliance with conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 2520, 9.3.2; 4305, 6.2; 4306, 6.2; and 4320, 6.2] Federally Enforceable Through Title V Permit
55. Copies of all fuel invoices, gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

56. Permittee shall maintain records of the wet ESP's secondary DC voltage and shall be made readily available for District inspection upon request [District Rule 2201] Federally Enforceable Through Title V Permit
57. Permittee shall maintain records of volume of fuel gas burned and TEOR gas incinerated, fuel gas and TEOR gas sulfur content, and such records shall be retained on site for a period of at least five years and shall be made readily available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
58. Sulfur compound emissions shall not exceed 0.11 lb of sulfur per million BTU. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas; multiplying the reported sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by a combination of source testing for sulfur compounds and fuel analysis. [District Rule 4406]
59. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall do one of the following: fire the unit only on PUC or FERC regulated natural gas; or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels; or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rules 4801 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
60. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of 40 CFR 60, Subpart Dc (except 60.44c(g) and (h) and 60.48c). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
61. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1372-317-18

ISSUANCE DATE: 07/12/2021

LEGAL OWNER OR OPERATOR: SENTINEL PEAK RESOURCES CA LLC

MAILING ADDRESS: 1200 DISCOVERY DR, STE 500
BAKERSFIELD, CA 93309

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
CA

SECTION: 06 **TOWNSHIP:** 30S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 67.5 MMBTU/HR NATURAL GAS/TEOR GAS-FIRED STEAM GENERATOR EQUIPPED WITH A NORTH AMERICAN MODEL MAGNA-FLAME G-LE LOW NOX BURNER, FGR AND EXHAUST GAS SOX SCRUBBER W/ESP SHARED WITH S-1372-16 AND '-127 (MCKITTRICK FRONT LEASE): ALLOW SIMULTANEOUS COMBUSTION OF TEOR GAS IN '-16 AND '-317, REVISE SOX EMISSIONS LIMIT TO 180 LB/DAY, LOWER CO EMISSIONS FACTOR, CORRECT VOC EMISSION FACTOR

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 - 241 lb, 2nd quarter - 241 lb, 3rd quarter - 241 lb, and fourth quarter - 242 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [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-1372-317-18 : Jul 12 2021 4:29PM -- DAVIDSOS : Joint Inspection NOT Required

4. ERC Certificate Number N-1553-1 (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
5. Unit shall be fired only on PUC quality natural gas or TEOR waste gas. [District Rule 2201] Federally Enforceable Through Title V Permit
6. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of gas combusted in the unit shall be installed, utilized and maintained for each fuel line. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
7. Vapors from TEOR operation, permit # S-1372-100 may be incinerated in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Exhaust from unit shall be directed only to SO₂ scrubber/wet ESP listed on S-1372-127 except when burning PUC quality natural gas exclusively. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Scrubber/wet ESP listed on S-1372-127 shall be in operation when combusting TEOR gas. [District Rule 2201] Federally Enforceable Through Title V Permit
10. All wells producing from strata steamed by this unit shall be connected to a District-approved emissions control system, have District-approved closed casing vents or be District-approved uncontrolled cyclic wells. [District Rule 4401] Federally Enforceable Through Title V Permit
11. This steam generator shall be exclusively fired on PUC quality natural gas when steam generators S-1372-13 and 24 are gas fired and incinerating TEOR waste gas. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4306 and 4320] Federally Enforceable Through Title V Permit
13. Duration of startup and shutdown shall not exceed 2 hours each per occurrence and, combined, shall not exceed 4 hours per day. During startup or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of startup and shutdown periods. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
14. SO_x (as SO₂) emissions from steam generator shall not exceed 180.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Except during start-up and shutdown, emissions from the steam generator shall not exceed any of the following limits: 9 ppmvd NO_x @ 3% O₂ or 0.011 lb-NO_x/MMBtu, , 0.008 lb-PM₁₀/MMBtu, 25 ppmvd CO @ 3% O₂ or 0.0185 lb-CO/MMBtu, or 0.0039 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. During start-up and shutdown, emissions from the steam generator shall not exceed any of the following limits: 15 ppmvd NO_x @ 3% O₂ or 0.018 lb-NO_x/MMBtu, 0.008 lb-PM₁₀/MMBtu, 25 ppmvd CO @ 3% O₂ or 0.0185 lb-CO/MMBtu, or 0.0039 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. NO_x emissions shall not exceed either of the following: 19.8 lb/day and 6,403 lb/y. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Total sulfur oxide (SO_x as SO₂) emissions shall not exceed 1,075.2 lb/day from steam generators S-1372-1, '2, '4, '127, '317, and flare '100. [District Rule 2201] Federally Enforceable Through Title V Permit
19. All vapor recovery gas burned in this device shall first be treated by the scrubber/wet ESP so at least 95% by weight of the sulfur is removed. [District Rules 2201, 4301, 4320, 4406, and 4801] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. Compliance with the 95% by weight sulfur removal efficiency shall be conducted at least once every twelve months. [District Rule 4320] Federally Enforceable Through Title V Permit
21. The SO_x emission control system efficiency shall be determined using the following equation: Percent Control Efficiency = $[(\text{CSO}_2, \text{inlet} - \text{CSO}_2, \text{outlet}) / \text{CSO}_2, \text{inlet}] \times 100$, where "CSO₂, inlet" is equal to the concentration of SO_x (expressed as SO₂) at the inlet side of the SO_x emission control system (in lb/dscf) and "CSO₂, outlet" is equal to the concentration of SO_x (expressed as SO₂) at the outlet side of the SO_x emission control system (in lb/dscf). [District Rule 4320] Federally Enforceable Through Title V Permit
22. The total gas fired in this unit, on a monthly average, shall be less than 50% PUC quality natural gas, by volume. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet and no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet. PUC quality natural gas also means high methane gas of at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
23. The permittee shall maintain monthly records of the volume of PUC quality natural gas and the total gas fired in this unit. Permittee shall keep monthly records of the percentage by volume of PUC quality gas fired and indicate if the volume of PUC quality gas fired is less than 50%. [District Rule 4320] Federally Enforceable Through Title V Permit
24. When complying with SO_x emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Methods 6, 6B, 8, or ARB 100. When operating unscrubbed, a grab sample analysis by double GC performed in the laboratory and EPA Method 19 may be used to calculate SO_x emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every 36 months unless testing is required by scrubber operational mode change as noted above. Annual source testing shall resume if any test fails to show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Sulfur compound (SO₂) emission limit compliance shall be demonstrated by fuel gas sulfur analysis performed 60 days prior to permit anniversary date. [District Rule 1081] Federally Enforceable Through Title V Permit
26. Compliance with casing gas sulfur compound emission limits shall be demonstrated by record keeping of TEOR gas flowrate and H₂S concentration. [District Rule 1070] Federally Enforceable Through Title V Permit
27. The wet ESP's secondary DC voltage shall be monitored weekly to ensure it is operating between 35 to 50KV [District Rule 2201] Federally Enforceable Through Title V Permit
28. Permittee shall maintain daily records of volume of natural gas burned and TEOR waste gas incinerated. [District Rule 2201] Federally Enforceable Through Title V Permit
29. Permittee shall measure and record, at least monthly, the sulfur content and BTU content of the TEOR waste gas incinerated in this unit. [District Rule 4406, 4.0] Federally Enforceable Through Title V Permit
30. Permittee shall measure and record the natural gas sulfur content and BTU content at the time of NO_x testing, except for natural gas purchased from a PUC regulated utility. [District Rule 4406, 4.0] Federally Enforceable Through Title V Permit
31. Exhaust stack shall be equipped with adequate provisions facilitating the collection of gas samples consistent with EPA Test Methods. [District Rule 1081] Federally Enforceable Through Title V Permit
32. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

33. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
34. 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
35. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
36. The portable analyzer shall be calibrated prior to each use with a two-point calibration method (zero and span). Calibration shall be performed with certified calibration gases. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
37. Source testing to measure NO_x and CO emissions from this unit 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
38. 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
39. 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
40. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
41. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate, no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
42. 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
43. NO_x 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
44. 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

CONDITIONS CONTINUE ON NEXT PAGE

45. Stack gas oxygen (O₂) 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
46. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320] Federally Enforceable Through Title V Permit
47. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
48. 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
49. In lieu of the annual source testing requirements of Rule 4320, compliance with the applicable emission limits may be demonstrated by submittal of annual emissions test results to the District from a unit or units that represents a group of units, provided that all of the conditions in Section 6.3.2 are met and documented. [District Rule 4320] Federally Enforceable Through Title V Permit
50. Annual test results submitted to the District from unit(s) representing a group of units may be used to demonstrate compliance with NO_x and CO limits of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NO_x or CO emissions limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement.) [District Rules 4305, 6.3.2, 4306, 4320, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
51. The following conditions must be met for representative unit(s) to be used to demonstrate compliance for NO_x and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input (rating not to exceed 100 MMBtu/hr), make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source. [District Rules 4305, 6.3.2, 4306, 4320, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
52. All units in a group for which representative units are source tested to demonstrate compliance for NO_x and CO limits of this permit shall have received the same maintenance and tune-up procedures as the representative unit(s). These tune-up procedures shall be completed according to District Rule 4304 (Adopted October 19, 1995) and tune-up test results shall show comparable results for each unit in the group. Records shall be maintained for the each unit of the group including all preventative and corrective maintenance work done. [District Rules 4305, 6.3.2, 4306, 6.3.2, 4320, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
53. All units in a group for which representative units are source tested to demonstrate compliance for NO_x and CO limits of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type (e.g. from natural gas to oil) then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch. [District Rules 4305, 6.3.2, 4306, 6.3.2, 4320, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
54. The number of representative units source tested to demonstrate compliance for NO_x and CO limits shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once. [District Rules 4305, 6.3.2, 4306, 6.3.2, 4320, and 4351, 6.3.2] Federally Enforceable Through Title V Permit
55. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be quarterly. If a quarterly fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
56. When complying with SO_x emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6B; or Method 8; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

57. If the unit is fired on noncertified gaseous fuel and compliance with SO_x emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3246, D 4084, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
58. If fuel analysis is used to demonstrate compliance with conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 2520, 9.3.2; 4305, 6.2; 4306, 6.2; and 4320, 6.2] Federally Enforceable Through Title V Permit
59. Copies of all fuel invoices, gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
60. Permittee shall maintain daily records of SO_x (as SO₂) emissions (lb/day) from steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
61. Permittee shall maintain records of the wet ESP's secondary DC voltage and shall be made readily available for District inspection upon request [District Rule 2201] Federally Enforceable Through Title V Permit
62. Permittee shall maintain records of volume of fuel gas burned and TEOR gas incinerated, fuel gas and TEOR gas sulfur content, and such records shall be retained on site for a period of at least five years and shall be made readily available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
63. Sulfur compound emissions shall not exceed 0.11 lb of sulfur per million BTU. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas; multiplying the reported sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by a combination of source testing for sulfur compounds and fuel analysis. [District Rule 4406]
64. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall do one of the following: fire the unit only on PUC or FERC regulated natural gas; or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels; or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rules 4801 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
65. This unit commenced construction, modification, or reconstruction prior to June 19, 1984. This unit has not been used to produce electricity for sale in 1985 or on or after November 15, 1990. Therefore, the requirements of 40 CFR 72.6(b) and 40 CFR 60.40c do not apply to this source. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit