FEB 23 2015
Juan Campos
California Resources Elk Hills, LLC
PO Box 1001
Tupman, CA 93276

RE: Final - Authority to Construct / Certificate of Conformity (Significant Modification)
Facility Number: S-2234
Project Number: S-1144001

Dear Mr. Campos:

The Air Pollution Control Officer has issued the Authority to Construct permits to California Resources Elk Hills, LLC for revised monitoring requirements for two gas turbine engines, near Tupman, CA. Enclosed are the Authority to Construct permits and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue the Authority to Construct permits was published on December 23, 2014. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on December 18, 2014. All comments received following the District's preliminary decision on this project were considered.

Comments received by the District during the public notice period resulted in minor changes due to public comment. These comments and the District responses to comments are included as an enclosure. These changes were minor and did not trigger additional public notification requirements, nor did they have any impact upon the Best Available Control Technology determination or on the amount of offsets required for project approval.

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

Central Region (Main Office)
1980 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: 661-392-5565

www.valleyair.org www.healthyairliving.com
Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,

[Signature]

Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Mike Tollstrup, CARB (w/enclosure) via email
cc: Gerardo C. Rios, EPA (w/enclosure) via email
EPA Comments for Proposed ATC/Title V Significant Modification Evaluation for Occidental of Elk Hills, Facility ID S-2234, Project # S-1144001

General EPA Comment

The purpose of this project is to allow the source to replace their existing certified CEM system with a certified PEM system. Such systems are required to meet the requirements contained in 40 CFR Part 60, Performance Specification 16. EPA has the following comments related to this new requirement based on the following conditions:

Condition 54 requires the new PEMs to meet the PS 16 requirements and reads as follows:

The NOx and O2 PEMS shall meet the requirements in 40 CFR 60, Performance Specifications 16 (PS-16), or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA.

Condition 5 also reads as follows:

The owner or operator shall install, certify, maintain, operate and quality-assure a Predictive Emission Monitoring System (PEMS) which continuously predicts and records the exhaust gas NOX, CO and O2 concentrations. Predictive emissions monitor(s) shall be capable of predicting emissions during normal operating conditions, and during startups and shutdowns provided the PEMS passes the relative accuracy requirement for startups and shutdowns specified herein. If relative accuracy of PEMS cannot be demonstrated during startup conditions, PEMS results during startup and shutdown events shall be replaced with startup emission rates obtained from source testing to determine compliance with emission limits contained in this permit.

EPA Comment #1

EPA is concerned that the ATC as proposed does not require the source to demonstrate that the PEMS meets the requirements of PS16 prior to allowing the discontinued use of the CEM. Please add a condition to the permit to specify what the monitoring requirements are if the source is not able to certify their PEMS or if they fail a required PEM RATA test.

District Response

The following new conditions have been added to the ATCs:

Prior to disconnecting the CEMs, the PEMS must pass a Relative Accuracy (RA) Test to be acceptable for use in demonstrating compliance with this permit. [District Rules 2201 and 4703 and 40 CFR 60.334(b)]
If PEMs fails to pass a quarterly RAA or yearly RATA test, or if changes are made that could result in a significant change in the emissions rate (e.g. turbine aging, process modification, new process operating modes, or changes to emission controls) the PEMs must be recertified using the test procedures in Section 8.1 of PS16. [District Rules 2201 and 4703 and 40 CFR 60.334(b)]

EPA Comment #2

EPA (also) notes that condition 5 specifies the PEM for NOx, CO and O2, whereas condition 54 only specifies NOx and O2. It appears Condition 54 should also include CO, if not, please explain the District's reasoning.

District Response

Condition 54 was revised to include CO.

EPA Comment #3

Unlike a CEM which actually measures emissions, the type of parameter monitoring subject to PS 16 predicts emissions to comply with stated emission limits. This type of PEM is significantly more stringent than simply monitoring parameters which are indicators of compliance. There is a need, as specified in PS16, Section 6.1.2 to develop operating envelopes which the source must operate under to ensure the PEM is providing accurate data. This is not true for a CEM. Because of the need to operate in a specific yet to be determined manner, EPA believes the ATC permit should have more specific requirements than simply requiring the source to comply with PS16. Another example is that PS16 has different requirements for sources with uncontrolled and controlled emissions. At a minimum, the District should require the source to provide a PEM protocol, specific for the source, which is reviewed and approved by the District. The parameters established here and/or as part of RATA testing, should then be specified as an enforceable permit condition. EPA does not believe the permit must specify each of the required PEM parameters, but that a requirement to maintain a PEM plan based on RATA testing and to comply with all established operating parameters would suffice. Without this type of document, it will be difficult to determine if the certified PEM is in compliance on an ongoing basis.

District Response

The following three new conditions were added to the ATCs:

Source shall provide a PEMs protocol, specific for the source, which is reviewed and approved by the District. [District Rules 2201 and 4703 and 40 CFR 60.334(b)]
Source shall maintain a PEM plan based on RATA testing and to comply with all established operating parameters. [District Rules 2201 and 4703 and 40 CFR 60.334(b)]

Operating envelope must be established to ensure that PEMs is providing accurate data. [District Rules 2201 and 4703 and 40 CFR 60.334(b)]

EPA Comment #4

Condition 7 is an existing condition which reads: Gas turbine engine shall be equipped with continuously recording NOx and O2 monitors for engine exhaust gas stream after duct burners and catalyst beds. It appears that this condition requires a CEM for these two pollutants, but the proposed project is to replace the CEM with a PEM. Please review and determine if this condition is still appropriate.

District Response

Condition 7 was deleted as it is no longer applicable.
AUTHORITY TO CONSTRUCT (ATC)

QUICK START GUIDE

1. **Pay Invoice.** Please pay enclosed invoice before due date.

2. **Fully Understand ATC.** Make sure you understand ALL conditions in the ATC prior to construction, modification and/or operation.

3. **Follow ATC.** You must construct, modify and/or operate your equipment as specified on the ATC. Any unspecified changes may require a new ATC.

4. **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.

5. **Source Test.** Schedule and perform any required source testing. See [http://www.valleyair.org/busind/comply/source_testing.htm](http://www.valleyair.org/busind/comply/source_testing.htm) for source testing resources.

6. **Maintain Records.** Maintain all records required by ATC. Records are reviewed during every inspection (or upon request) and must be retained for 5 years.

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.

---

Seyed Sadredin
Executive Director/Air Pollution Control Officer

**Northern Region**
4600 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**
1990 E. Gettysburg Avenue
Fresno, CA 93728-0244
Tel: (559) 230-8000 FAX: (559) 230-8081

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

[www.valleyair.org](http://www.valleyair.org) [www.healthyairliving.com](http://www.healthyairliving.com)
AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-52-10  
ISSUANCE DATE: 02/13/2015

LEGAL OWNER OR OPERATOR: CALIFORNIA RESOURCES ELK HILLS, LLC
MAILING ADDRESS: PO BOX 1001
TUPMAN, CA 93276

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: NE35  TOWNSHIP: 30S  RANGE: 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ONE 24.5 MW NATURAL GAS-FIRED GAS TURBINE COGENERATION SYSTEM, INCLUDING 250 MMBTU/HR GENERAL ELECTRIC MODEL LM-2500 GAS TURBINE, 103 MMBTU/HR DUCT BURNER ASSEMBLY, 150,000 LB/HR HEAT RECOVERY STEAM GENERATOR, AND 6 MW STEAM TURBINE SERVING S-2234-52 AND S-2234-53: REPLACE CEMS WITH PEMS

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. All equipment shall be maintained and operated according to manufacturers' recommendations. [District Rule 2201] Federally Enforceable Through Title V Permit

4. Circular cross section exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and equipped with flow straighteners, if necessary, to minimize turbulence. [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.

Seyed Sadredin, Executive Director / APCO
5. The owner or operator shall install, certify, maintain, operate and quality-assure a Predictive Emission Monitoring System (PEMS) which continuously predicts and records the exhaust gas NOX, CO and O2 concentrations. Predictive emissions monitor(s) shall be capable of predicting emissions during normal operating conditions, and during startups and shutdowns provided the PEMS passes the relative accuracy requirement for startups and shutdowns specified herein. If relative accuracy of PEMS cannot be demonstrated during startup conditions, PEMS results during startup and shutdown events shall be replaced with startup emission rates obtained from source testing to determine compliance with emission limits contained in this permit. [District Rules 2201 and 4703 and 40 CFR 60.334(b)] Federally Enforceable Through Title V Permit

6. Prior to disconnecting the CEMs, the PEMS must pass a Relative Accuracy (RA) Test to be acceptable for use in demonstrating compliance with this permit. [District Rules 2201 and 4703 and 40 CFR 60.334(b)] Federally Enforceable Through Title V Permit

7. If PEMS fails to pass a quarterly RAA or yearly RATA test, or if changes are made that could result in a significant change in the emissions rate (e.g. turbine aging, process modification, new process operating modes, or changes to emission controls) the PEMS must be recertified using the test procedures in Section 8.1 of PS16. [District Rules 2201 and 4703 and 40 CFR 60.334(b)]

8. Source shall provide a PEMS protocol, specific for the source, which is reviewed and approved by the District. [District Rules 2201 and 4703 and 40 CFR 60.334(b)] Federally Enforceable Through Title V Permit

9. Source shall maintain a PEMS plan based on RATA testing and to comply with all established operating parameters. [District Rules 2201 and 4703 and 40 CFR 60.334(b)] Federally Enforceable Through Title V Permit

10. Operating envelope must be established to ensure that PEMS is providing accurate data. [District Rules 2201 and 4703 and 40 CFR 60.334(b)] Federally Enforceable Through Title V Permit

11. The NOx, CO, and O2 PEMS shall meet the requirements in 40 CFR 60, Performance Specifications 16 (PS-16), or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [40 CFR 60.334(b)(1) and, District Rule 1080, 6.3, 6.5, 6.6, & 7.2] Federally Enforceable Through Title V Permit

12. The PEMS shall be linked to a data logger which is compatible with the District's Data acquisition system. Upon notice by the District that the facility's PEMS system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the PEMS data is sent to the District by a District-approved alternative method. [District Rule 1080, 7.1] Federally Enforceable Through Title V Permit

13. Gas turbine engine and duct burner assembly shall be equipped with continuously recording fuel gas flowmeters. [District Rule 2201] Federally Enforceable Through Title V Permit

14. Startup and shutdown of gas turbine engine, as defined in 40 CFR Subpart A 60.2, shall not exceed a time period of one hour and one hour, respectively, per occurrence. [District Rules 2201 and 4703, 5.3.1] Federally Enforceable Through Title V Permit

15. Gas turbine engine combustor steam injection system shall be equipped with continuously recording steam-to-fuel injection rate monitoring system accurate to within +/- 5%. [District Rule 2201] Federally Enforceable Through Title V Permit

16. Except during periods of gas turbine engine startup/shutdown, gas turbine engine steam injection rate shall be maintained at steam-to-fuel ratio range documented to result in compliance with emission limits. [District Rule 2201] Federally Enforceable Through Title V Permit

17. All exhaust from gas turbine engine and duct burners shall flow through both SCR and oxidation catalyst beds. [District Rule 2201] Federally Enforceable Through Title V Permit

18. Gas temperatures at SCR and oxidation catalyst inlets shall be monitored by operational temperature indicators. [District Rule 2201] Federally Enforceable Through Title V Permit

19. Except during periods of gas turbine engine startup/shutdown, inlet gas temperatures of SCR and oxidation catalyst beds shall be maintained within ranges recommended by the catalyst manufacturers. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE
20. Ammonia injection grid shall be equipped with operational ammonia flowmeter and injection pressure indicator. [District Rule 2201] Federally Enforceable Through Title V Permit

21. Installed SCR and oxidation catalyst beds shall provide space for additional catalyst if source operation cannot achieve emission sampling limits of NOx, VOC, and CO. [District Rule 2201] Federally Enforceable Through Title V Permit

22. Except during periods of gas turbine engine startup/shutdown, gas turbine engine shall be shut down if steam injection or SCR system is inoperative. [District Rule 2201] Federally Enforceable Through Title V Permit

23. Ammonia injection rate shall be controlled to maintain ammonia "breakthrough" to less than 20 ppmv (3-hr rolling average) from gas turbine exhaust. [District Rule 4102]

24. Excess emissions shall be defined as any operating hour in which 4-hour rolling average NOx concentration exceeds applicable emissions limit and a period of monitor downtime shall be any unit operating hour in which sufficient data are not obtained to validate the hour for either NOx or O2 (or both). [40 CFR 60.334(J)(1)(iii)] Federally Enforceable Through Title V Permit

25. Transitional Operation Period shall be defined as any of following periods: bypass transition period, primary re-ignition period, reduced load period, start-up or shutdown. [District Rule 4703, 3.33] Federally Enforceable Through Title V Permit

26. Bypass Transition Period shall be defined as the duration of time that a gas turbine's operation transitions between the heat recovery steam generator and bypass exhaust stacks, provided all of the following conditions are met: a) The selective catalytic reduction catalyst is not within the required temperature range or the required ammonia saturation level has not yet been achieved; b) The duration of a bypass transition period shall not exceed two hours; c) NOx emissions shall not exceed 15 ppmvd, corrected to 15% O2, averaged over two (2) hours; and d) The applicable CO compliance limit shall not be exceeded. [District Rule 4703, 3.2] Federally Enforceable Through Title V Permit

27. Primary Re-ignition Period shall be defined as the duration of time during which a gas turbine is operated at less than rated capacity in order to reset the DLN combustion system following a primary re-ignition, provided all of the following conditions are met: a) The duration of a primary re-ignition period shall not exceed one hour; b) NOx emissions shall not exceed 15 ppmvd, corrected at 15% O2, averaged over one (1) hour; and c) CO emissions shall not exceed 25 ppmvd, corrected at 15% O2. [District Rule 4703, 3.20] Federally Enforceable Through Title V Permit

28. Reduced Load Period shall be defined as the time during which a gas turbine is operated at less than rated capacity in order to change the position of the exhaust gas diverter gate, not to exceed one hour. [District Rule 4703, 3.23] Federally Enforceable Through Title V Permit

29. The emission control system shall be in operation and emissions shall be minimized insofar as technologically feasible during each transitional operation period. [District Rule 4703, 5.3.2] Federally Enforceable Through Title V Permit

30. No more than 6.00 MMscf/day of natural gas shall be consumed by gas turbine and no more than 2.47 MMscf/day of natural gas shall be consumed by duct burners. [District Rule 2201] Federally Enforceable Through Title V Permit

31. Maximum emissions from turbines S-2234-52 & -53 and standby boilers/heaters S-2234-1 & -3 shall not exceed the following daily emission limitations (DEL): PM10: 50.6 lb/day, NOx (as NO2): 245.7 lb/day, VOC: 51.4 lb/day, and CO: 544.6 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

32. During days of gas turbine startup/shutdown, daily NO2 and CO emissions shall be calculated by natural gas consumption rates, PEMS results, and emission factors for standby boilers/heaters. [District Rule 2201] Federally Enforceable Through Title V Permit

33. During days of gas turbine startup/shutdown, permittee shall maintain accurate daily records of natural gas consumption in gas turbines for normal operation and startup/shutdown periods, and in LTS-1 & LTS-2 gas plant standby boilers/heaters. [District Rule 2201] Federally Enforceable Through Title V Permit

34. Permittee shall maintain daily records of NO2 and CO emission calculations during days of gas turbine startup/shutdown, and such records shall be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

35. Permittee shall maintain accurate records of PEMS predicted NOx and CO emissions, and daily natural gas consumption in gas turbine & duct burners, and shall make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE
36. Permittee shall report the following emission exceedances to the District: emission rates of NOx and CO on a 3-hr rolling average, NSPS NOx emission rate on one hour average, and DEL of NOx & CO during days of gas turbine engine startup/shutdown. [District Rule 2201] Federally Enforceable Through Title V Permit

37. Gas turbine lube oil system atmospheric vent shall be equipped with aerosol/smoke control provisions. [District Rule 2201] Federally Enforceable Through Title V Permit

38. Emission rates from gas turbine lube oil vent shall not exceed the following: PM10: 0.02 lb/hr and VOC: 0.00 lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit

39. PM10 and VOC emissions from lube oil vent shall be measured by source testing within 60 days upon detection of visible emissions in excess of 5% opacity or Ringelmann 1/4 from gas turbine lube oil vent. [District Rule 2201] Federally Enforceable Through Title V Permit

40. Except during periods of startup/shutdown, emission rates (3-hr rolling average) from gas turbine combustion shall not exceed: PM10: 0.004 lb/MMBtu, NOx as NO2: 0.013 lb/MMBtu & 3.75 ppmvd @ 15% O2, VOC: 0.004 lb/MMBtu, and CO: 0.043 lb/MMBtu. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

41. Except during periods of startup/shutdown, emission rates (3-hr rolling average) from duct burner combustion shall not exceed: PM10: 0.001 lb/MMBtu, NOx as NO2: 0.008 lb/MMBtu, VOC: 0.001 lb/MMBtu, and CO: 0.007 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

42. NOx, VOC, CO, and ammonia emissions shall be measured by source testing annually. [District Rule 2201] Federally Enforceable Through Title V Permit

43. Permittee shall maintain steam to fuel ratio during annual compliance testing to within +/- 5% of the average daily values recorded during the 60 day period prior to annual testing. [District Rule 2201] Federally Enforceable Through Title V Permit

44. Permittee shall maintain exhaust gas temperatures at SCR and oxidation catalyst inlets to within +/- 5% of the average daily values recorded during the 60 day period prior to annual testing. [District Rule 2201] Federally Enforceable Through Title V Permit

45. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

46. The results of each source test shall be submitted to the District within 60 days of field testing. [District Rule 1081] Federally Enforceable Through Title V Permit

47. LTS-1 and LTS-2 gas plants (S-2234-3 & '1) standby boilers/heaters shall only be used when one or both gas turbines (S-2234-52 & '53) are inoperative. [District Rule 2201] Federally Enforceable Through Title V Permit

48. Gas turbine shall be equipped with turbine combustor steam injection system, selective catalytic reduction (SCR) with ammonia injection, and oxidation catalyst system. [District Rule 2201] Federally Enforceable Through Title V Permit

49. Unit shall be fired exclusively on PUC-quality natural gas which has a sulfur content of less than or equal to 0.0034% by weight. [40 CFR 60.333(a) & (b)] Federally Enforceable Through Title V Permit

50. Operator shall not discharge into the atmosphere combustion contaminants (PM) exceeding in concentration at the point of discharge, 0.1 gr/dscf. [District Rule 4201] Federally Enforceable Through Title V Permit

51. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the monitoring devices required by this rule to ensure that such devices are functioning properly. [District Rule 1080, 11.0] Federally Enforceable Through Title V Permit

52. Operator shall be required to conform to the compliance testing procedures described in District Rule 1081. [District Rule 1081] Federally Enforceable Through Title V Permit

53. If the turbine is not fired on PUC-regulated natural gas, then the sulfur content (as hydrogen sulfide) of the natural gas being fired in the turbine shall be calculated using a continuous monitor averaged over a daily basis in accordance with SCAQMD Rule 431.1 Attachment A (as amended June 12, 1998). [District Rule 2520, 9.3.2, 40 CFR 60.335(d)] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE
54. If the turbine is not fired on PUC-regulated natural gas, the sulfur content (as hydrogen sulfide) of each fuel source shall be tested. [40 CFR 60.334(b)(2)] Federally Enforceable Through Title V Permit

55. The HHV and LHV of the fuel shall be determined using ASTM D3588-91, ASTM 1826-88, OR ASTM 1945-81. [40 CFR 60.332(a),(b) and District Rule 4703, 6.4.5] Federally Enforceable Through Title V Permit

56. Performance testing shall be conducted annually to measure NOx and CO emission concentrations using the following test methods: EPA Methods 7E or 20 for NOx emissions, EPA Methods 10 or 10B for CO emissions, EPA Methods 3, 3A, or 20 for Oxygen content of the exhaust gas. The 9-run tests shall be performed at highest physically achievable load of the gas turbine. [40 CFR 60.335(a), (b)(7) and District Rule 4703, 6.3.1, 6.4.1, 6.4.2, & 6.4.3] Federally Enforceable Through Title V Permit

57. The PEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and date recording) for each successive 15-minute period or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [40 CFR 60.334(b)FSand District Rule 1081, 6.4] Federally Enforceable Through Title V Permit

58. Results of the PEMS system shall be averaged over a three hour period, using consecutive 15-minute sampling periods in accordance with all applicable requirements of CFR 60.13. [40 CFR 60.13 and District Rule 4703, 5.1, 6.4] Federally Enforceable Through Title V Permit

59. Any gas turbine with an intermittently operated auxiliary burner shall demonstrate compliance with the auxiliary burner both on and off. [40 CFR 60.335(b) and District Rule 4703, 6.3.3] Federally Enforceable Through Title V Permit

60. Records shall be maintained and shall contain: the occurrence and duration of any start-up, shutdown, performance testing, evaluations, calibrations, checks, adjustments, any periods during which a continuous monitoring system or monitoring device is inoperative, maintenance of any PEMS that have been installed pursuant to District Rule 1080, and emission measurements. [District Rules 1080, 7.3, and 4703, 6.2.8, and 40 CFR 60.7 (b)] Federally Enforceable Through Title V Permit

61. If the turbine is fired on PUC-regulated natural gas, then maintain on file copies of natural gas bills. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

62. The operator of a stationary gas turbine system shall maintain records of the date, time and duration of each bypass transition period and each primary re-ignition period. [District Rule 4703, 6.2.11] Federally Enforceable Through Title V Permit

63. The operator of a stationary gas turbine system shall provide source test information annually regarding the exhaust gas NOx and CO concentrations and the control efficiency of the emission control device. [District Rule 4703, 6.3.1] Federally Enforceable Through Title V Permit

64. Results of PEMs must be averaged in accordance with the requirements of 40 CFR 60.13. [40 CFR 60.334(a),(b),(c) and District Rule 4703, 5.0] Federally Enforceable Through Title V Permit

65. Operator shall maintain a stationary gas turbine operating log that includes, on a daily basis the actual local start-up and stop time, length and reason for reduced load periods, total hours of operation and quantity of fuel used. [40 CFR 60.332(a),(b) and District Rule 4703, 6.2.4] Federally Enforceable Through Title V Permit

66. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: 40 CFR 60.333 (a) and (b); 60.334(a),(b), and (c)(1); SJVUAPCD Rule 4703, Section 6.2.2 and 1080, 7.3. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

67. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: SJVUAPCD Rule 4201, 1081 and 1080, Sections 6.5, 7.2, 8.0, 9.0, and 10.0; 40 CFR 60.332(c) and (d); 60.334(b) and (c)(2); 60.335(d). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

68. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: SJVUAPCD Rule 4703, sections 5.0, 5.1.1, 6.2.1, 6.2.4, 6.3, 6.4.1, 6.4.3, 6.4.5, and 6.4.6. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
69. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: 40 CFR 60.332(a), (b); 60.335(a), (b), (c), and (e). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

70. Operator shall install, operate and maintain in calibration a system which continuously measures and records: control system operating parameters, elapsed time of operation, the exhaust gas NOx and O2 concentrations. [40 CFR 60.334(a), (b)] Federally Enforceable Through Title V Permit

71. A violation of NOx emission standards indicated by the NOx PEMS shall be reported by the operator to the APCO within 96 hours. [District Rule 1080, 9.0] Federally Enforceable Through Title V Permit

72. Operator shall submit a semiannual report listing any daily period during which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8% by weight. [40 CFR 60.334(c)(2)] Federally Enforceable Through Title V Permit

73. Operator shall notify the APCO no later than eight hours after the detection of a breakdown of the PEMS. Operator shall inform the APCO of the intent to shut down the PEMS at least 24 hours prior to the event. [District Rule 1080, 10.0] Federally Enforceable Through Title V Permit

74. Operators of PEMS installed at the direction of the APCO shall submit a written report for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include: A. time intervals, data and magnitude of excess emissions, nature and cause of excess (if known), corrective actions taken and preventive measures adopted; B. averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; C. applicable time and date of each period during which the PEMS was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; D. a negative declaration when no excess emissions occurred. [District Rule 1080, 8.0] Federally Enforceable Through Title V Permit

75. NOx and carbon monoxide daily emissions shall be measured by use of PEM data, fuel rate data, and daily hours of operation data. A written record of the required compliance demonstrations shall be maintained and made available for District inspection for a period of five years. [District Rule 2201] Federally Enforceable Through Title V Permit

76. Operator shall maintain a stationary gas turbine operating log that includes, on a daily basis, the actual local start-up and stop time, length and reason for reduced load periods, total hours of operation and quantity of fuel used. [District Rule 4703] Federally Enforceable Through Title V Permit

77. The owner or operator shall maintain records that contain the following: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, any periods during which a continuous monitoring system or monitoring device is inoperative, maintenance of any PEM system that has been installed pursuant to District Rule 1080, and emission measurements. [District Rules 1080 and 4703 and 40 CFR 60.8(d)] Federally Enforceable Through Title V Permit

78. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit
AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-53-8

LEGAL OWNER OR OPERATOR: CALIFORNIA RESOURCES ELK HILLS, LLC
MAILING ADDRESS: PO BOX 1001
TUPTMAN, CA 93276

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPTMAN, CA

ISSUANCE DATE: 02/13/2015

SECTION: NE35 TOWNSHIP: 30S RANGE: 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ONE 24.5 MW NATURAL GAS-FIRED GAS TURBINE COGENERATION SYSTEM, INCLUDING 250 MMBTU/HR GENERAL ELECTRIC MODEL LM-2500 GAS TURBINE, 103 MMBTU/HR DUCT BURNER ASSEMBLY, AND 150,000 LB/HR HEAT RECOVERY STEAM GENERATOR: REPLACE CEMS WITH PEMS

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. All equipment shall be maintained and operated according to manufacturers' recommendations. [District Rule 2201] Federally Enforceable Through Title V Permit

4. Circular cross section exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and equipped with flow straighteners, if necessary, to minimize turbulence. [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.

Seyed Sadredin, Executive Director / APCO
5. The owner or operator shall install, certify, maintain, operate and quality-assure a Predictive Emission Monitoring System (PEMS) which continuously predicts and records the exhaust gas NOX, CO and O2 concentrations. Predictive emissions monitor(s) shall be capable of predicting emissions during normal operating conditions, and during startups and shutdowns provided the PEMS passes the relative accuracy requirement for startups and shutdowns specified herein. If relative accuracy of PEMS cannot be demonstrated during startup conditions, PEMS results during startup and shutdown events shall be replaced with startup emission rates obtained from source testing to determine compliance with emission limits contained in this permit. [District Rules 2201 and 4703 and 40 CFR 60.334(b)] Federally Enforceable Through Title V Permit

6. Prior to disconnecting the CEMs, the PEMs must pass a Relative Accuracy (RA) Test to be acceptable for use in demonstrating compliance with this permit. [District Rules 2201 and 4703 and 40 CFR 60.334(b)] Federally Enforceable Through Title V Permit

7. If PEMs fails to pass a quarterly RAA or yearly RATA test, or if changes are made that could result in a significant change in the emissions rate (e.g. turbine aging, process modification, new process operating modes, or changes to emission controls) the PEMs must be recertified using the test procedures in Section 8.1 of PS16. [District Rules 2201 and 4703 and 40 CFR 60.334(b)]

8. Source shall provide a PEMs protocol, specific for the source, which is reviewed and approved by the District. [District Rules 2201 and 4703 and 40 CFR 60.334(b)] Federally Enforceable Through Title V Permit

9. Source shall maintain a PEM plan based on RATA testing and to comply with all established operating parameters. [District Rules 2201 and 4703 and 40 CFR 60.334(b)] Federally Enforceable Through Title V Permit

10. Operating envelope must be established to ensure that PEMs is providing accurate data. [District Rules 2201 and 4703 and 40 CFR 60.334(b)] Federally Enforceable Through Title V Permit

11. The NOx, CO, and O2 PEMS shall meet the requirements in 40 CFR 60, Performance Specifications 16 (PS-16), or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [40 CFR 60.334(b)(1) and, District Rule 1080, 6.3, 6.5, 6.6, & 7.2] Federally Enforceable Through Title V Permit

12. The PEMS shall be linked to a data logger which is compatible with the District’s Data acquisition system. Upon notice by the District that the facility’s PEMS system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the PEMS data is sent to the District by a District-approved alternative method. [District Rule 1080, 7.1] Federally Enforceable Through Title V Permit

13. Gas turbine engine and duct burner assembly shall be equipped with continuously recording fuel gas flowmeters. [District Rule 2201] Federally Enforceable Through Title V Permit

14. Startup and shutdown of gas turbine engine, as defined in 40 CFR Subpart A 60.2, shall not exceed a time period of one hour and one hour, respectively, per occurrence. [District Rules 2201 and 4703, 5.3.1] Federally Enforceable Through Title V Permit

15. Gas turbine engine combustor steam injection system shall be equipped with continuously recording steam-to-fuel injection rate monitoring system accurate to within +/- 5%. [District Rule 2201] Federally Enforceable Through Title V Permit

16. Except during periods of gas turbine engine startup/shutdown, gas turbine engine steam injection rate shall be maintained at steam-to-fuel ratio range documented to result in compliance with emission limits. [District Rule 2201] Federally Enforceable Through Title V Permit

17. All exhaust from gas turbine engine and duct burners shall flow through both SCR and oxidation catalyst beds. [District Rule 2201] Federally Enforceable Through Title V Permit

18. Gas temperatures at SCR and oxidation catalyst inlets shall be monitored by operational temperature indicators. [District Rule 2201] Federally Enforceable Through Title V Permit

19. Except during periods of gas turbine engine startup/shutdown, inlet gas temperatures of SCR and oxidation catalyst beds shall be maintained within ranges recommended by the catalyst manufacturers. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE
20. Ammonia injection grid shall be equipped with operational ammonia flowmeter and injection pressure indicator. [District Rule 2201] Federally Enforceable Through Title V Permit

21. Installed SCR and oxidation catalyst beds shall provide space for additional catalyst if source operation cannot achieve emission sampling limits of NOx, VOC, and CO. [District Rule 2201] Federally Enforceable Through Title V Permit

22. Except during periods of gas turbine engine startup/shutdown, gas turbine engine shall be shut down if steam injection or SCR system is inoperative. [District Rule 2201] Federally Enforceable Through Title V Permit

23. Ammonia injection rate shall be controlled to maintain ammonia "breakthrough" to less than 20 ppmv (3-hr rolling average) from gas turbine exhaust. [District Rule 4102]

24. Excess emissions shall be defined as any operating hour in which 4-hour rolling average NOx concentration exceeds applicable emissions limit and a period of monitor downtime shall be any unit operating hour in which sufficient data are not obtained to validate the hour for either NOx or O2 (or both). [40 CFR 60.334(J)(1)(iii)] Federally Enforceable Through Title V Permit

25. Transitional Operation Period shall be defined as any of following periods: bypass transition period, primary re-ignition period, reduced load period, start-up or shutdown. [District Rule 4703, 3.33] Federally Enforceable Through Title V Permit

26. Bypass Transition Period shall be defined as the duration of time that a gas turbine's operation transitions between the heat recovery steam generator and bypass exhaust stacks, provided all of the following conditions are met: a) The selective catalytic reduction catalyst is not within the required temperature range or the required ammonia saturation level has not yet been achieved; b) The duration of a bypass transition period shall not exceed two hours; c) NOx emissions shall not exceed 15 ppmvd, corrected to 15% O2, averaged over two (2) hours; and d) The applicable CO compliance limit shall not be exceeded. [District Rule 4703, 3.2] Federally Enforceable Through Title V Permit

27. Primary Re-ignition Period shall be defined as the duration of time during which a gas turbine is operated at less than rated capacity in order to reset the DLN combustion system following a primary re-ignition, provided all of the following conditions are met: a) The duration of a primary re-ignition period shall not exceed one hour; b) NOx emissions shall not exceed 15 ppmvd, corrected at 15% O2, averaged over one (1) hour; and c) CO emissions shall not exceed 25 ppmvd, corrected at 15% O2. [District Rule 4703, 3.20] Federally Enforceable Through Title V Permit

28. Reduced Load Period shall be defined as the time during which a gas turbine is operated at less than rated capacity in order to change the position of the exhaust gas diverter gate, not to exceed one hour. [District Rule 4703, 3.23] Federally Enforceable Through Title V Permit

29. The emission control system shall be in operation and emissions shall be minimized insofar as technologically feasible during each transitional operation period. [District Rule 4703, 5.3.2] Federally Enforceable Through Title V Permit

30. No more than 6.00 MMscf/day of natural gas shall be consumed by gas turbine and no more than 2.47 MMscf/day of natural gas shall be consumed by duct burners. [District Rule 2201] Federally Enforceable Through Title V Permit

31. Maximum emissions from turbines S-2234-52 & -53 and standby boilers/heaters S-2234-1 & -3 shall not exceed the following daily emission limitations (DEL): PM10: 50.6 lb/day, NOx (as NO2): 245.7 lb/day, VOC: 51.4 lb/day, and CO: 544.6 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

32. During days of gas turbine startup/shutdown, daily NO2 and CO emissions shall be calculated by natural gas consumption rates, PEMS results, and emission factors for standby boilers/heaters. [District Rule 2201] Federally Enforceable Through Title V Permit

33. During days of gas turbine startup/shutdown, permittee shall maintain accurate daily records of natural gas consumption in gas turbines for normal operation and startup/shutdown periods, and in LTS-1 & LTS-2 gas plant standby boilers/heaters. [District Rule 2201] Federally Enforceable Through Title V Permit

34. Permittee shall maintain daily records of NO2 and CO emission calculations during days of gas turbine startup/shutdown, and such records shall be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

35. Permittee shall maintain accurate records of PEMS predicted NOx and CO emissions, and daily natural gas consumption in gas turbine & duct burners, and shall make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE
36. Permittee shall report the following emission exceedances to the District: emission rates of NOx and CO on a 3-hr rolling average, NSPS NOx emission rate on one hour average, and DEL of NOx & CO during days of gas turbine engine startup/shutdown. [District Rule 2201] Federally Enforceable Through Title V Permit

37. Gas turbine lube oil system atmospheric vent shall be equipped with aerosol/smoke control provisions. [District Rule 2201] Federally Enforceable Through Title V Permit

38. Emission rates from gas turbine lube oil vent shall not exceed the following: PM10: 0.02 lb/hr and VOC: 0.00 lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit

39. PM10 and VOC emissions from lube oil vent shall be measured by source testing within 60 days upon detection of visible emissions in excess of 5% opacity or Ringelmann 1/4 from gas turbine lube oil vent. [District Rule 2201] Federally Enforceable Through Title V Permit

40. Except during periods of startup/shutdown, emission rates (3-hr rolling average) from gas turbine combustion shall not exceed: PM10: 0.004 lb/MMBtu, NOx as NO2: 0.013 lb/MMBtu & 3.75 ppmvd @ 15% O2, VOC: 0.004 lb/MMBtu, and CO: 0.043 lb/MMBtu. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit

41. Except during periods of startup/shutdown, emission rates (3-hr rolling average) from duct burner combustion shall not exceed: PM10: 0.001 lb/MMBtu, NOx as NO2: 0.008 lb/MMBtu, VOC: 0.001 lb/MMBtu, and CO: 0.007 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

42. NOx, VOC, CO, and ammonia emissions shall be measured by source testing annually. [District Rule 2201] Federally Enforceable Through Title V Permit

43. Permittee shall maintain steam to fuel ratio during annual compliance testing to within +/- 5% of the average daily values recorded during the 60 day period prior to annual testing. [District Rule 2201] Federally Enforceable Through Title V Permit

44. Permittee shall maintain exhaust gas temperatures at SCR and oxidation catalyst inlets to within +/- 5% of the average daily values recorded during the 60 day period prior to annual testing. [District Rule 2201] Federally Enforceable Through Title V Permit

45. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

46. The results of each source test shall be submitted to the District within 60 days of field testing. [District Rule 1081] Federally Enforceable Through Title V Permit

47. LTS-1 and LTS-2 gas plants (S-2234-3 & '1) standby boilers/heaters shall only be used when one or both gas turbines (S-2234-52 & '53) are inoperative. [District Rule 2201] Federally Enforceable Through Title V Permit

48. Gas turbine shall be equipped with turbine combustor steam injection system, selective catalytic reduction (SCR) with ammonia injection, and oxidation catalyst system. [District Rule 2201] Federally Enforceable Through Title V Permit

49. Unit shall be fired exclusively on PUC-quality natural gas which has a sulfur content of less than or equal to 0.0034% by weight. [40 CFR 60.333(a) & (b)] Federally Enforceable Through Title V Permit

50. Operator shall not discharge into the atmosphere combustion contaminants (PM) exceeding in concentration at the point of discharge, 0.1 gr/dscf. [District Rule 4201] Federally Enforceable Through Title V Permit

51. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the monitoring devices required by this rule to ensure that such devices are functioning properly. [District Rule 1080, 11.0] Federally Enforceable Through Title V Permit

52. Operator shall be required to conform to the compliance testing procedures described in District Rule 1081. [District Rule 1081] Federally Enforceable Through Title V Permit

53. If the turbine is not fired on PUC-regulated natural gas, then the sulfur content (as hydrogen sulfide) of the natural gas being fired in the turbine shall be calculated using a continuous monitor averaged over a daily basis in accordance with SCAQMD Rule 431.1 Attachment A (as amended June 12, 1998). [District Rule 2520, 9.3.2, 40 CFR 60.335(d)] Federally Enforceable Through Title V Permit
54. If the turbine is not fired on PUC-regulated natural gas, the sulfur content (as hydrogen sulfide) of each fuel source shall be tested. [40 CFR 60.334(b)(2)] Federally Enforceable Through Title V Permit

55. The HHV and LHV of the fuel shall be determined using ASTM D3588-91, ASTM 1826-88, OR ASTM 1945-81. [40 CFR 60.332(a),(b) and District Rule 4703, 6.4.5] Federally Enforceable Through Title V Permit

56. Performance testing shall be conducted annually to measure NOx and CO emission concentrations using the following test methods: EPA Methods 7E or 20 for NOx emissions, EPA Methods 10 or 10B for CO emissions, EPA Methods 3, 3A, or 20 for Oxygen content of the exhaust gas. The 9-run tests shall be performed at highest physically achievable load of the gas turbine. [40 CFR 60.335(a), (b)(7) and District Rule 4703, 6.3.1, 6.4.1, 6.4.2, & 6.4.3] Federally Enforceable Through Title V Permit

57. The PEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and date recording) for each successive 15-minute period or shall meet equivalent specifications established by mutual agreement of the District, the ARB, and the EPA. [40 CFR 60.334(b)FSand District Rule 1081, 6.4] Federally Enforceable Through Title V Permit

58. Results of the PEMS system shall be averaged over a three hour period, using consecutive 15-minute sampling periods in accordance with all applicable requirements of CFR 60.13. [40 CFR 60.13 and District Rule 4703, 5.1, 6.4] Federally Enforceable Through Title V Permit

59. Any gas turbine with an intermittently operated auxiliary burner shall demonstrate compliance with the auxiliary burner both on and off. [40 CFR 60.335(b) and District Rule 4703, 6.3.3] Federally Enforceable Through Title V Permit

60. Records shall be maintained and shall contain: the occurrence and duration of any start-up, shutdown, performance testing, evaluations, calibrations, checks, adjustments, any periods during which a continuous monitoring system or monitoring device is inoperative, maintenance of any PEMS that have been installed pursuant to District Rule 1080, and emission measurements. [District Rules 1080, 7.3, and 4703, 6.2.8, and 40 CFR 60.7 (b)] Federally Enforceable Through Title V Permit

61. If the turbine is fired on PUC-regulated natural gas, then maintain on file copies of natural gas bills. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

62. The operator of a stationary gas turbine system shall maintain records of the date, time and duration of each bypass transition period and each primary re-ignition period. [District Rule 4703, 6.2.11] Federally Enforceable Through Title V Permit

63. The operator of a stationary gas turbine system shall provide source test information annually regarding the exhaust gas NOx and CO concentrations and the control efficiency of the emission control device. [District Rule 4703, 6.3.1] Federally Enforceable Through Title V Permit

64. Results of PEMs must be averaged in accordance with the requirements of 40 CFR 60.13. [40 CFR 60.334(a),(b),(c) and District Rule 4703, 5.0] Federally Enforceable Through Title V Permit

65. Operator shall maintain a stationary gas turbine operating log that includes, on a daily basis the actual local start-up and stop time, length and reason for reduced load periods, total hours of operation and quantity of fuel used. [40 CFR 60.332(a),(b) and District Rule 4703, 6.2.4] Federally Enforceable Through Title V Permit

66. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: 40 CFR 60.333 (a) and (b); 60.334(a),(b), and (c)(1); SJVUAPCD Rule 4703, Section 6.2.2 and 1080, 7.3. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

67. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: SJVUAPCD Rule 4201, 1081 and 1080, Sections 6.5, 7.2, 8.0, 9.0, and 10.0; 40 CFR 60.332(c) and (d); 60.334(b) and (c)(2); 60.335(d). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

68. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: SJVUAPCD Rule 4703, sections 5.0, 5.1.1, 6.2.1, 6.2.4, 6.3, 6.4.1, 6.4.3, 6.4.5, and 6.4.6. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE
69. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: 40 CFR 60.332(a), (b); 60.335(a), (b), (c), and (e). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

70. Operator shall install, operate and maintain in calibration a system which continuously measures and records: control system operating parameters, elapsed time of operation, the exhaust gas NOx and O2 concentrations. [40 CFR 60.334(a),(b)] Federally Enforceable Through Title V Permit

71. A violation of NOx emission standards indicated by the NOx PEMS shall be reported by the operator to the APCO within 96 hours. [District Rule 1080, 9.0] Federally Enforceable Through Title V Permit

72. Operator shall submit a semiannual report listing any daily period during which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8% by weight. [40 CFR 60.334(c)(2)] Federally Enforceable Through Title V Permit

73. Operator shall notify the APCO no later than eight hours after the detection of a breakdown of the PEMS. Operator shall inform the APCO of the intent to shut down the PEMS at least 24 hours prior to the event. [District Rule 1080, 10.0] Federally Enforceable Through Title V Permit

74. Operators of PEMS installed at the direction of the APCO shall submit a written report for each calendar quarter to the APCO. The report is due on the 30th day following the end of the calendar quarter and shall include: A. time intervals, data and magnitude of excess emissions, nature and cause of excess (if known), corrective actions taken and preventive measures adopted; B. averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; C. applicable time and date of each period during which the PEMS was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; D. a negative declaration when no excess emissions occurred. [District Rule 1080, 8.0] Federally Enforceable Through Title V Permit

75. NOx and carbon monoxide daily emissions shall be measured by use of PEM data, fuel rate data, and daily hours of operation data. A written record of the required compliance demonstrations shall be maintained and made available for District inspection for a period of five years. [District Rule 2201] Federally Enforceable Through Title V Permit

76. Operator shall maintain a stationary gas turbine operating log that includes, on a daily basis, the actual local start-up and stop time, length and reason for reduced load periods, total hours of operation and quantity of fuel used. [District Rule 4703] Federally Enforceable Through Title V Permit

77. The owner or operator shall maintain records that contain the following: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, any periods during which a continuous monitoring system or monitoring device is inoperative, maintenance of any PEM system that has been installed pursuant to District Rule 1080, and emission measurements. [District Rules 1080 and 4703 and 40 CFR 60.8(d)] Federally Enforceable Through Title V Permit

78. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rules 2201 and 4703] Federally Enforceable Through Title V Permit