



June 3, 2020

Valerie Muller
San Pablo Bay Pipeline Company LLC
3760 Kilroy Airport Way, Ste 3000
Long Beach, CA 90806

RE: Notice of Final Action - Authority to Construct
Facility Number: N-2224
Project Number: N-1193930

Dear Ms. Muller:

The Air Pollution Control Officer has issued the Authority to Construct permit to San Pablo Bay Pipeline Company LLC for the modification of an existing 20.0 MMBtu/hr pipeline oil heater to replace the existing burner with a new low NOx burner and to remove the 82 billion Btu/year heat input limit, at 6801 Pete Miller Road, Gustine, CA. Enclosed are the Authority to Construct permit 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 Authority to Construct permit was posted on April 27, 2020. The District's analysis of the proposal was also sent to CARB on April 27, 2020. 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.

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

Ms. Valerie Muller
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Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Errol Villegas at (559) 230-6000.

Sincerely,

A handwritten signature in blue ink, reading "A. Arnaud Marjollet". The signature is fluid and cursive, with a horizontal line drawn underneath the name.

Arnaud Marjollet
Director of Permit Services

AM:ddb

Enclosures

cc: Courtney Graham, CARB (w/ enclosure) via email



AUTHORITY TO CONSTRUCT

PERMIT NO: N-2224-2-7

ISSUANCE DATE: 06/02/2020

LEGAL OWNER OR OPERATOR: SAN PABLO BAY PIPELINE COMPANY LLC

MAILING ADDRESS: 3760 KILROY AIRPORT WAY, SUITE 300
LONG BEACH, CA 90806

LOCATION: GUSTINE PUMP STATION
6801 PETE MILLER RD
GUSTINE, CA 95322

EQUIPMENT DESCRIPTION:

MODIFICATION OF 20 MMBTU/HR NORTH AMERICAN MODEL #5131-250-H CRFA OIL HEATER; NON-COMPLIANT DORMANT EMISSIONS UNIT: REPLACE THE EXISTING BURNER WITH A NEW NORTH AMERICAN MODEL 4213 LOW NOX BURNER, REMOVE DORMANT OPERATING STATUS, REMOVE REPLACEMENT UNIT FOR N-2224-1 OPERATING STATUS, AND REMOVE ANNUAL HEAT INPUT LIMIT

CONDITIONS

1. Upon implementation of the modification and startup of the equipment authorized by this Authority to Construct (ATC), this facility will no longer be a major source for any pollutant and the District Rule 2530 recordkeeping requirements shall be removed from all permits to operate. [District Rules 2201 and 2530]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
6. The unit shall only be fired on PUC-quality natural gas. [District Rules 2201 and 4320]
7. Emissions rates from the natural gas-fired unit shall not exceed any of the following limits: 7 ppmv NO_x @ 3% O₂ or 0.008 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.003 lb-PM₁₀/MMBtu, 400 ppmv CO @ 3% O₂ or 0.296 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 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

Arnaud Marjollet, Director of Permit Services

N-2224-2-7 : Jun 2 2020 11:32AM -- BROWND : Joint Inspection NOT Required

8. 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]
9. 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]
10. 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]
11. 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]
12. Source testing to measure NO_x and CO emissions from this unit while fired on natural gas shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320]
13. Source testing to measure NO_x and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320]
14. 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]
15. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320]
16. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306, and 4320]
17. 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]
18. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320]
19. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320]

CONDITIONS CONTINUE ON NEXT PAGE

20. 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]
21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
22. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320]
23. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306 and 4320]