\_\_ NORTHERN REGION

CENTRAL REGION

# **ERC/PUBLIC NOTICE CHECK LIST**

2------

\_\_ SOUTHERN REGION

PROJECT# <u>950579</u>	MODEM FILE NAME:

 $\sqrt{\sqrt{}}$ REQST. COMPL.

ERC TRANSFER	۲ OF	PREVIOUSLY	BANKED	CREDITS
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ERC PRELIMINARY PUBLIC NOTICE

- ERC FINAL PUBLIC NOTICE \_\_\_\_\_
- NSR/CEQA PRELIMINARY PUBLIC NOTICE \_\_\_\_
- NSR/CEQA FINAL PUBLIC NOTICE -----

### ENCLOSED DOCUMENTS REQUIRE:

	Enter Correct Date, Print All Documents from Modemed File and Obtain Directors Signature
<u> </u>	Senc PRELIMINARY/FINAL Notice Letters to CARB, EPA and Applicant; Including the Following Attachments: Application Evaluation Other
<u> </u>	Sent PRELIMINARY/FINAL Public Notice for Publication to <u>Fresho</u> Bee
<u> </u>	Send Signed Copies of PRELIMINARY/FINAL Notice Letters to Regional Office Attn: <u>George Heinen</u>
	Director's Signature and District Seal Embossed on ERC Certificates
	Director's Signature on Cover Letter and Mail Cover Letter & ERC Certificates by Certified Mail to: Applicant: <u>Applicant Address</u> Applicant and Additional Addressees (see cover letters) Other
	Send Copies of Signed and Seal Embossed ERC Certificates and Signed cover letter to Regional Office Attn:
	Other Special Instructions (please specify)
Date Comple	eted 2/22/46 /By Martin Keast
Date Added	to Seyed Directory:

Date Added to Seyed Directory.

Upon Completion FAX to Regional Office Attn:\_\_\_\_\_

# **PROJECT ROUTING FORM**

PROJECT NUMBER: 950579 FACILITY ID: 1659 PERMIT NOs: APPLICANT NAME: UNGIN OIL COMPANY OF CALIFORNIA DBA UNOCAL

PREMISE ADDRESS: CALAVERAS AVENUE SW 1/4 SEC 7 T195 R16E, COALINGA

ſ	PRELIMINARY REVIEW	ENGR	DATE	SUPR	DATE
ŀ	A. Application Deemed Incomplete				/_
	B. Application Deemed Complete [] Awaiting CB Offsets	KT	10/12/95	Ro	10/12
	C. Application Pending Denial	 			/
	D. Application Denied				

6.4

Ĩ	ENGINEERING EVALUATION	INIT	DATE	:
	E. Engineering Evaluation Complete	Sant	1/30/44	
ce.	F. Supervising Engineer Approval	MK.	2/2/96	2/22/4
76	G. Compliance Division Approval [X] Not Required			
-	H. Permit Services Manager Approval			
-	Director Review: [] Not Required [X] Rec	uired		

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[X] Required

CLERICAL STAFF: Perform tasks as indicated below. Initial and date when completed.

[ ] <u>PRELIMINARY REVIEW</u> [ ] [ ]	_ Mail Incompleteness Letter to the Applicant. _ Mail Completeness Letter to the Applicant. Mail Intent to Deny Letter to the Applicant (Certified Mail).
[]	Mail Denial Letter to the Applicant (Certified Mail).
[ ] PROJECTS NOT REQUIRING PUBLIC NOTIFICATION	Ā
[ ] PRELIMINARY DISPOSITION: [ ]	_ Mail Imminent Denial Letter to the Applicant (Certified Mail).
[ ] FINAL DISPOSITION: [ ]	_ Mail ATC(s) to Distribution.
	Mail Denial Letter to the Applicant (Certified Mail).
[ ] PROJECTS REQUIRING PUBLIC NOTIFICATION	
PRELIMINARY DECISION: [ ]	_ Deliver Ad to the Newspaper NOT LATER THAN
	Mail copies of Cover Letter and Engineering Evaluation to Distribution.
[VENAL DECISION: []	_ Deliver Ad to the Newspaper NOT LATER THAN
Julale	_ Mail copies of Cover Letter and ATC(s) to Distribution.
DISTRIBUTION	
[ ] APPLICANT [ ]	EPA - 75 Hawthorne St., San Francisco, CA 94105 Attn: A-3-4
[ ] ENGINEER [ ]	ARB - Stationary Source Div. Chief, PO Box 2815, Sacramento, CA 95812
[ ] COMPLIANCE [ ] [ ] PREMISE FILE	SIVUAPCD - 1999 Tuolumne St., Fresno, CA 95721 Attn: Seyeu Sadreom
[ ]BLDG DEPT	OTHER
[ ] FIRE DEPT	[]SCHOOL

Unocal Energy Resources Division Unocal Corporation Calaveras Avenue, P.O. Box 1074 Coalinga, California 93210 Telephone (209) 935-0771



January 19, 1996

JAN 2 3 1996

PERMIT SERVICES

Oil & Gas Operations North San Joaquin, Central California

San Joaquin Valley Unified Air Pollution Control District Central Region Office 1999 Tuolumne Street, Suite 200 Fresno, California 93721

Attn: Mr. George Hinen

**Dear George:** 

As required by San Joaquin Valley Unified APCD, Unocal is hereby submitting the additional information for Project # 950579. Requested fuel consumption for the period commencing with August 1990 through September 1991 is as follows;

August 1990	24.960 mmcf	
September 1990	25.135 mmcf	
October 1990	25.596 mmcf	
November 1990	25.590 mmcf	
December 1990	27.925 mmcf	
January 1991	22.450 mmcf	
February 1991	18.135 mmcf	
March 1991	20.651 mmcf	
April 1991	28.205 mmcf	
May 1991	24.793 mmcf	
June 1991	25.829 mmcf	
July 1991	32.031 mmcf	
August 1991	31.231 mmcf	
September 1991	34.817 mmcf	

If you should have any questions regarding this application, please call me at (209) 935-7225.

Sincerely

UNION OIL COMPANY OF CALIFORNIA

dba UNOCAL folde fr.

George N. Folks Jr. Sr. Staff Environmental Specialist

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# UNOCAL COALINGA NOSE FIELD PRODUCTION DEPARTMENT FAX TRANSMITTAL TO: GEORGE HINNEN AT LOCATION STULAPCO FROM: GEORGE FOLKS (UNOCAL - CONUMOR DATE: 1/19/96 TIME: 11:15 AM ITEM BEING TRANSMITTED: FLUEL USE PROSECT # 950579 NO. OF PAGES (INCLUDING THIS COVER PAGE): \_\_\_\_\_ CONFIRMATION: NO THANK YOU YES \_\_\_ SENDER: CHEORAE FOLKS PHONE NO (209) 935-7225

Unocal Energy Resources Division Unocal Corporation Calavoras Avenue, P.O. Box 1074 Coalinga, California 93210 Telephone (209) 935-0771

# **UNOCAL**®

January 19, 1996

Oil & Gas Operations North San Joaquin, Central California

San Joaquin Valley Unified Air Pollution Control District Central Region Office 1999 Tuolumne Street, Suite 200 Fresno, California 93721

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July 1991	32.031 mmcf	
August 1991	31.231 mmcf	
September 1991	34.817 mmcf	

If you should have any questions regarding this application, please call me at (209) 935-7225.

Sincerely

UNION OIL COMPANY OF CALIFORNIA

dba UNOCAL p. vorge ł ø

George N. Folks Jr. Sr. Staff Environmental Specialist

Turbler.doc

Unocal Energy Resources Division Unocal Corporation Calaveras Avenue, P.O. Box 1074 Coalinga, California 93210 Telephone (209) 935-0771

JAN 1 7 1996 PERMIT SERVICES SIVUAPCD



January 15, 1996

Oil & Gas Operations North San Joaquin, Central California

> San Joaquin Valley Unified Air Pollution Control District Central Region Office 1999 Tuolumne Street, Suite 200 Fresno, CA 93721

Attn: Ms. Karen Tani

Dear Karen:

Enclosed you will find all the additional fuel use data that was obtainable from the Unocal archives. 1987 was as far back as our records go on Unocal's Coalinga Nose Unit three (3) natural gas fired solar turbines. All data provided represents the cumulative annual total for the three (3) units in question.

1984 = No data available 1985 = No data available 1986 = No data available 1987 = 321,352 mmcf/yr 1988 = 303,854 mmcf/yr 1989 = 302,372 mmcf/yr 1990 = 325,270 mmcf/yr 1991 = 331,125 mmcf/yr 1992 = 368,846 mmcf/yr 1993 = 195,669 mmcf/yr 1994 = 0 1995 = 0

Note: DER TELCON W/G. FOLKS, jr., THE DATA SHOWLD BE CORRECTED AS INDICATED ABOVE, EG. 1987 FUELUSE IS 321.352 Million SCF, NOT 321,352 MILLION SCF

3200

If you should have any questions in regards to this application, please call me at (209) 935-7225.

Sincerely,

UNION OIL COMPANY OF CALIFORNIA dba UNOCAL

lorge N.

George N. Folks Jr. Sr. Staff Environmental Specialist

GNF/ksg DOC:WORD:#1:1-15-96A





October 12, 1995

George Folks Jr. Unocal P O Box 1074 Coalinga CA 93210

Re: Project # 950579 Project Description: Emissions Reduction Credits for Shutdown of Gas Turbines

Dear Mr. Folks:

Your application for Emissions Reduction Credits for the above-referenced project has been received by the Air Pollution Control District, and has been reviewed for completeness.

Based on this preliminary review, the application appears to be complete. However, during processing, the District may request additional information to clarify, correct or otherwise supplement the information on file.

Thank you for your cooperation. Should you have any questions, please telephone Ms. Karen Tani of Permit Services at (209) 497-1100.

Sincerely,

Seyed Sadredin Director of Permit Services

David Warner Permit Services Manager - Central Region

kt

David L. Crow Executive Director/Air Pollution Control Officer

1999 Tuolumne Street. Suite 200 • Fresno. CA 33721 • (209) 497-1000 • FAX (209) 233-2057

#### Northern Region

4230 Kiernan Avenue, Suite 130 • Modesto, CA 95356 (209) 545-7000 • Fax (209) 545-8652 Central Region 1999 Tuolumne Street, Suite 200 • Fresno, CA 93721 (209) 497-1000 • Fax (209) 233-2057 Southern Region 2700 M Street, Suite 275 • Bakerslield, CA 93301 (805) 861-3682 • Fax (805) 861-2060

### RECEIVED

#### **APPLICATION FOR:**

SEP 2 8 1995

PERMIT SEMICES SUVUERCD

# [X] EMISSION REDUCTION CREDIT (ERC)[ ] CONSOLIDATION OF ERC CERTIFICATES

[] ERC WITHDRAWL

[ ] ERC TRANSFER OF OWNERSHIP

1.	1. ERC TO BE ISSUED TO: UNION OIL COMPANY OF CALIFORNIA dba UNOCAL								
2.	MAILING ADDRESS:								
	Street/P.O. Box: <u>P.O. Box 1074</u>								
	City: <u>Coalinga</u> Zip Code <u>93210</u>							Zip Code_ <b>93210</b>	
<u>.</u> 3.	LOCATION OF R	EDUCTION:							
	Street:_ <u>Calavera</u>	s Avenue, SW	/ 1/4 Sec. 7.T1	9s,R16e	i	4.	DATE OF	ON:_ <u>8/01/93</u>	
	City: <u>Coalinga</u>								
5.	PERMIT NO(S):	C-1659-39-0,C	C-1659-40-0,C	-1659-4	1-0		E	XISTING ERC NO(S):	
6.	METHOD RESUL	LTING IN EM	ISSION REDU	JCTION	1:				
	[X] SHUTDOWN [] RETROFIT [] PROCESS CHANGE [] OTHER DESCRITPION: These three Solar Gas Turbines are no longer utilized in the Unocal/CNU Natural Gas Treating Facility operations and have been subsequently shutdown awaiting potential sale. (see attachments)								
7.	REQUESTED ER	C's (In Pounds	PEr Calendar	Quarter	):				
		VOC	NOx	C	0	PM10	SOx	OTHER	
	1ST QUARTER	2,079	27,123	10,8	349	negligible	negligibl	e 6 Mo/Avg	
	2ND QUARTER	2,106	27,470	10,9	988	negligible	negligibl	e 6 Mo/Avg	
	3RD QUARTER	2,079	27,123	10,8	<b>349</b> 1	negligible	negligibl	e 6 Mo/Avg	
	4TH QUARTER	1,884	24,576	9,8	30	negligible	negligibl	e 6 Mo/Avg	
8.	8. SIGNATURE OF APPLICANT: Jeorge A. Forming				TYPE OR PRINT TITLE OF APPLICANT: Sr. Staff Environmental Specialist			PPLICANT: ntal Specialist	
9.	9. TYPE OF PRINT NAME OF APPLICANT: George N. Folks Jr.				DATE:	9/20/95		TELEPHONE NO: (209)935-7225	

FOR APCD USE ONLY:

DATE STAMP	FILING FEE RECEIVED: \$
	DATE PAID: 9/28/95 -
· · · · · · · · · · · · · · · · · · ·	PROJECT NO: 950579 FAC JU# 1659

Central Regional Office\* P.O. Box 1312\* Fresno, CA 93715 \* 1999 Tuolumne St., Suite #200 \* (209) 497-1000 \* FAX (209) 233-2057

Unocal Energy Resources Division Unocal Corporation Calaveras Avenue, P.O. Box 1074 Coalinga, California 93210 Telephone (209) 935-0771

RECEIVED SEP 2 8 1995

> PERMIT SERVICES SJVUAPCD

**UNOCAL**®

September 20, 1995

Oil & Gas Operations North San Joaquin, Central California

> San Joaquin Valley Unified Air Pollution Control District Central Region Office 1999 Tuolumne Street, Suite 200 Fresno, CA 93721

Attn: Mr. Martin Keast

Dear Martin:

Enclosed you will find the application for Emission Reduction Credits on Unocal's Coalinga Nose Unit three (3) natural gas fired solar turbines.

In addition, you will find a check issued to the San Joaquin Valley Unified Air Pollution Control District in the amount of \$470.00 as requested in your June 8, 1994 memo to me referencing application #C-1659-68-0 (see attachment).

If you should have any questions in regards to this application, please call me at (209) 935-7225.

Sincerely,

UNION OIL COMPANY OF CALIFORNIA

Longe /

George N. Folks Jr. Sr. Staff Environmental Specialist

RECEIVED

SEP 2 8 1995

SJVUAPCD ()K# 01000035599 \$470.00 ERC PM = 9-25-95 ()))

GNF/ksg DOC:WORD:#1:9-20A

### **Unocal Corporation**

### **Natural Gas Fired**

### **Solar Turbine Gas Compressors**

Coalinga Nose Unit Natural Gas Treating Facility

### I. <u>NAME</u>

2.48 March

- A. Business License Name: Unocal Oil & Gas Division
- B. Nature of Business: Oil & Gas Production
- C. Name, Address, and Phone Number of person to contact regarding this application: George N. Folks Jr. Sr. Staff Environmental Specialist P.O. Box 1074 Coalinga, CA 93210

(209) 935-7225

- D. Type of Use Entitlement: Fee/Lease
- E. Estimated Construction Date: These units were installed in 1982.

### II. <u>TYPE OF APPLICATION</u>

A. This is an application for Emission Reduction Credits on three (3) natural gas fired 1150 h.p. each solar/saturn turbine gas compressors used for compressing dry commercial grade natural gas.

### III. DESCRIPTION OF FACILITY

A. Location:

Unocal Corporation Coalinga Nose Unit Natural Gas Treating Facility Section 7, T20S, R16E, MDB&M

### Page 2

### IV. DESCRIPTION OF PROCESS

- A. The three (3) solar gas compressors are used for the compression of dry commercial grade natural gas <2% V.O.C. once fractionation has occurred.
- B. Operations Schedule: Idle

### V. BASIC PROCESS EQUIPMENT

А.	1. Equipment Identification:	Three (3) solar/saturn turbine, 1150 h.p. gas compressors
	2. Material Entering Equipment:	Dry <2% V.O.C. commercial grade natural gas
Β.	1. Fuel Type:	Dry natural gas
	2. Equipment Manufacturer:	Solar Turbines, Division of Caterpillar Mfg.

3. See attachment for emissions calculations.

### VI. EQUIPMENT DESCRIPTION:

Three (3) 36.2 MM BTU/hr. solar/saturn natural gas fired turbines 1150 hp each to drive natural gas compressors.

### VII. DESCRIPTION OF ACTUAL EMISSION REDUCTION:

The actual emission reduction credits generated by this application will be accomplished by the <u>permanent</u> shutdown of P/O's C-1659-39-0, C-1659-40-0, and C-1659-41-0. Additionally, the units in question are scheduled for sale.

As a result of process changes in Unocal's natural gas treating facility, which occurred in the first half of 1993, it was found that these three natural gas fired turbines were no longer needed to maintain a continuous sales gas flow. With this process change completion on August 1, 1993, the units in question were placed in an idle status, pending eventual sale.

Page 3

### VIII. JUSTIFICATION FOR ALTERNATE 2 YEARS:

Unocal requests that historical actual emissions be calculated from 8/1/91 - 8/1/93 due to the continuous operation of these units during this time period, and not from 8/1/93 - 8/1/95 because each respective unit was in an idle non-use status during this period pending eventual sale.

### IX. ACTUAL FUEL USAGE:

The following data represents actual fuel usage for the three natural gas fired 1150 hp solar/saturn gas turbines with associate natural gas compressors. All fuel gas totals are measured in MMSCF.

August 1991	= 31,231	January 1992	= 29,596	January 1993	= 31,829
September 1991	= 29,772	February 1992	= 30,540	February 1993	= 25,770
October 1991	= 31,361	March 1992	= 31,274	March 1993	= 28,028
November 1991	= 27,187	April 1992	= 31,162	April 1993	= 29,075
December 1991	= 31,677	May 1992	= 30,410	May 1993	= 27,137
		June 1992	= 28,665	June 1993	= 27,640
		July 1992	= 31,354	July 1993	= 26,190
		August 1992	= 30,225		
		September 1992	= 30,020		
		October 1992	= 31,281		
		November 1992	= 31,053		
		December 1992	= 33,266		

### X. FUEL GAS ANALYSIS:

Enclosed please find the fuel gas analysis for Unocal, Coalinga Nose Unit, during the periods in which the ERC applications are based.

### XI. EMISSIONS CALCULATIONS:

See attachment.

DOC:WORD:#1:2-25

NATURAL GAS FIRED TURBINES, 4TH QUARTER AVERAGE	
---	--

TOTAL FUEL USE(SCE/HB) =	37926		
H2S CONCENTRATION IN FUEL (PPMV) =	0		
HOW MANY ENGINES AT THIS SITE?	3		
LIST HORSEPOWER BATING FOR FACH ENGINE	Ċ,		
1 1150 HORSEPOWER			
2 1150 HORSEPOWER			
3 1150 HORSEPOWER			
4 HORSEPOWER			
5 HORSEPOWER			
6 HORSEPOWER			
7 HORSEPOWER			
	AD TABLE 2 0-1		
ALL EMISSION FACTORS FROM EFA FODEIOATION AF	42, TADEL 3.2-1		
	-		
$= 11 2778 \mid B/HD$			

=

PM = 2.5 LB/MMCF \* MMCF/HR FUEL USE = 0.094815

Manufacturer Efficiency L 25% per George Jollie

### NATURAL GAS FIRED TURBINES, 3RD QUARTER AVERAGE

TOTAL FUEL USE(SCF/HR)=	•	41857
H2S CONCENTRATION IN F	UEL(PPMV)=	0
HOW MANY ENGINES AT TH	IIS SITE?	3
LIST HORSEPOWER RATING	FOR EACH ENGINE.	
1	1150 HORSEPOWER	
2	1150 HORSEPOWER	
3	1150 HORSEPOWER	
4	HORSEPOWER	
5	HORSEPOWER	
6	HORSEPOWER	
7	HORSEPOWER	
ALL EMISSION FACTORS FF	ROM EPA PUBLICATION	AP-42, TABLE 3.2-1

CALCULATION

SO2 = 1.7\*10 ^ -7 \* FUEL USE/HR \* PPMV H2S IN FUEL = 0 LB/HR

NOX = 300 LB/MMCF \* MMCF/HR FUEL USE 12.5571 LB/HR =

- NMHC = 23 LB/MMCF \* MMCF/HR FUEL USE 0.962711 LB/HR =
- CO = 120 LB/MMCF \* MMCF/HR FUEL USE 5.02284 LB/HR =
- PM = 2.5 LB/MMCF \* MMCF/HR FUEL USE0.104643
  - =

NATURAL GAS FIRED TURBINES, 2ND QUARTER AVERAGE				
TOTAL FUEL USE(SCF/HR) = H2S CONCENTRATION IN FUEL(PPMV) = HOW MANY ENGINES AT THIS SITE? LIST HORSEPOWER RATING FOR EACH ENGINE. 1 1150 HORSEPOWER 2 1150 HORSEPOWER 3 1150 HORSEPOWER 4 HORSEPOWER 5 HORSEPOWER 6 HORSEPOWER 7 HORSEPOWER	42392 0 3			
ALL EMISSION FACTORS FROM EPA PUBLICATION AP-42, TA	BLE 3.2-1			
CALCULATION ====================================				
NOX = 300 LB/MMCF * MMCF/HR FUEL USE = 12.7176 LB/HR				
NMHC = 23 LB/MMCF * MMCF/HR FUEL USE = 0.975016 LB/HR				
CO = 120 LB/MMCF * MMCF/HR FUEL USE = 5.08704 LB/HR				

- PM = 2.5 LB/MMCF \* MMCF/HR FUEL USE
  - = 0.10598

NATURAL GAS FIRED TURBINES, 1ST QUARTER AVERAG	E
TOTAL FUEL USE(SCF/HR)=	41857
H2S CONCENTRATION IN FUEL(PPMV)=	0
HOW MANY ENGINES AT THIS SITE?	3
LIST HORSEPOWER RATING FOR EACH ENGINE.	
1 1150 HORSEPOWER	
2 1150 HORSEPOWER	
3 1150 HORSEPOWER	
4 HORSEPOWER	
5 HORSEPOWER	
6 HORSEPOWER	
7 HORSEPOWER	
ALL EMISSION FACTORS FROM EPA PUBLICATION AP-4	2, TABLE 3.2-1
CALCULATION	
===========	
SO2 = 1.7*10 ^ -7 * FUEL USE/HR * PPMV H2S IN FUEL	
= 0 LB/HR	
NOX = 300 LB/MMCF * MMCF/HR FUEL USE	
= 12.5571 LB/HR	
NMHC = 23 LB/MMCF * MMCF/HR FUEL USE	
= 0.962711 LB/HR	
CO = 120 LB/MMCF * MMCF/HR FUEL USE	
= 5.02284 LB/HR	

- PM = 2.5 LB/MMCF \* MMCF/HR FUEL USE
  - = 0.104643

State Cert. #1396

(805) 765-2364 FAX (805) 765-6920

LABORATORY REPORT

### STATE CERT. # 1396

CUSTOMER: UNIOCAL - COALINGA ATTENTION: JIM BRIXEY

ЯЗ

RESULTS:

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a,

SAMPLE DESCRIPTION: FUEL GAS - 34A COLLECTED ON 11-19-92 ANALYTICAL PARAMETER: C6+

Midway \Laboratory

Petroleum-Industrial-Agriculture 315 Main Street + P.O. Box 1151 Tatt, California 93268

> LOG #: 5931-1 DATE IN: 11-19-92 DATE COMPLETED: 11-20=92

### RECEIVED

### DEC 1 1 1992

### COALINGA

CONSTITUENT	Mole %	Liq.Vol %	BTU/Cu.Ft.	Wt. %
Methane	90.765	86,843	918.54	83.561
Ethane	7.928	11.967	140.56	13.680
Propane	0.200	0.311	5.05	0.506
Iso-Butane	0.000	0.000	0.00	0.000
N-Butane	0.000	0.000	0.00	0.000
Iso-Pentane	0.000	0.000	0.00	0.000
N-Pentane	0.000	0.000	0.00	0.000
Hexanes Plus	0.000	0.000	0.00	0.000
Non-Hydrocarbons				
Carbon Dioxide	0.513	0.494	0.00	1.296
Hydrogen Sulfide	0.000	0.000	0.00	0.000
Nitrogen	0.584	0.361	0.00	0.939
Oxygen	0.010	0.023	0.00	0.018
TOTALS	100.000	100.000	1064.14	100.000
F Factor: 8240.03 Z Factor: 0.9977	5 DSCF/MMBT	U Real BTU: Wet BTU:	1066.55 GPM . 1048.00 SP.G	0.05493 R. 0.60277
%C 74.26 %H 21	.09 %0	3.71 %N	0.94 %S	0.00

#### NOTES:

#### REFERENCES:

-BTU/Cu.Ft. dry 60/60 14.73 peia. 1.) ABTM- Calculating Calorific Value -Specific Gravity dry 60/60 14.73 and Specific Gravity of Gasseque peia. Fuels. ABTM-D 3588 1981. -0.000 Values refer to less than. 2.) ABTM- Analysis of Natural Gas by minimum detection limit. Gas Chromatography. ABTM-D 1945

pur M-Sha YLC  $\boldsymbol{<}$ 

Mayur Shah Laboratory Director

### MIDWAY LABOR TORY

PETROLEUM-INDUSTRY-AGRICULTURE (805)765-2364 315 Main St. Taft, CA 93268 FAX (805)765-6920

LABORATORY REPORT

STATE CERT. # 1396

CUSTOMER: UNION OIL COALINGA. ATTENTION: LAB.

LDG #: 4226-1 DATE IN: 09-19-91 DATE COMPLETED: 09/23/91 DATE OUT:10-01-91

SAMPLE DESCRIPTION: FUEL GAS.

ANALYTICAL PARAMETER: C6+ GENERAL GAS ANALYSIS.

RESULTS:

CONSTITUENT	Mole %	Liq.Vol %	BTU/Cu.Ft.	Wt. %
Methane	92.193	88.892	932.99	85.682
Ethane	6.285	9.561	111.43	10.948
Propane	0.397	0.622	10.02	1.014
Iso-Butane	0.007	0.013	0.23	0.024
N-Butane	0.007	0.013	0.23	0.024
Iso-Pentane	0.000	0.000	0.00	0.000
N-Pentane	0.000	0.000	0.00	0.000
Hexanes Plus	0.028	0.066	1.33	0.140
Non-Hydrocarbons				
Carbon Dioxide	0.443	0.430	0.00	1.129
Carbon Monoxide	0.000	0.000	0.00	0.000
Hydrogen	0.000	0.000	0.00	0.000
Hydrogen Sulfide	0.000	0.000	0.00	0.000
Nitrogen	0.637	0.397	0.00	1.034
Oxygen	0.003	0.007	0.00	0.006
TOTALS	100.000	100.000	1056.23	100.000
F Factor: 8325.70 Z Factor: 0.9978	58 DSCF/MMBTU	Real BTU: Wet BTU:	1058.56 GPM . 1040.14 SP.GP	17.39207 R. 0.59706
%C 74.19 %H 2:	1.75 %0 3.	03 %N	1.03 %S	0.00

#### NOTES:

#### REFERENCES:

-BTU/Cu.Ft. dry 60/60 14.73 pais. 1.) ABTM- Calculating Calorific Value -Specific Gravity dry 60/60 14.73 and Specific Gravity of Gasseous pais. Fuels. ABTM-D 3588 1981. -0.000 Values refer to less than. 2.) ABTM- Analysis of Natural Gas by minimum detection limit. Gas Chromatography. ABTM-D 1945

Maryann W. Benoit

Maryann W. Denost Laboratory Director

# Midway Laboratory

(805) 765-2364 FAX (805) 765-6920

PETROLEUM - INDUSTRIAL - AGRICULTURE 315 Main St., P.O. Box 1151 Taft, CA 93268

#### LABORATORY REPORT ELAP STATE CERT. #1396

CUSTOMER: Unocal ATTENTION: Jim Brixey LOG #: 5334-5 DATE IN:06/05/92 DATE COMPLETED:06/24/92

SAMPLE DESCRIPTION: Fuel/Coalinga Collected on 6/5/92

ANALYTICAL PARAMETER: BTX&E

**RESULTS:** 

(	CONSTITUENT	mg/L	PQL mg/L	METHOD #
	Benzene	0.14	0.005	8020
	Toluene	0.08	0.005	8020
	Ethyl Benzene	0.42	0.005	8020
	Xylene	1.89	0.005	8020
Total	Volat. Aromatics.	2.53		

#### NOTES:

1.) NA=Not applicable

2.) \*=Repeated and confirmed

3.) N.D.=None detected -Constituent if present would be less than the practical quantitation limit (PQL).

#### **REFERENCES:**

- 1.) APHA-AWWA-WPCF, "Standard Methods for the Examination of Water and Wastewater" copyright 1985.
- 2.) EPA, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", U.S. EPA SW-846, 1987 Edition.

10-yurm. shah

Mayur M. Shah Laboratory Director



### AIR POLLUTION CONTROL DISTRICT FEES

FACILITY I.D. # 1659

,

LOCATION: Natural Gas Production, Fresno County

BILLING FOR: FILING FEES

BILLING DATE: June 8, 1994

TOTAL FEES	\$	650.00
CREDIT	<u>\$</u>	<u>180.00</u>
BALANCE DUE	\$	470.00

### THE ABOVE TOTALS ARE BASED ON THE FOLLOWING ITEMIZED LISTING

APPLICATION	FEE	DESCRIPTION
C-1659-68-0	650.00	Emission Reduction Credit for Shut
		Down of Three Gas Turbines

PLEASE RETURN A COPY OF THIS BILL WITH THE AMOUNT DUE WITHIN 30 DAYS TO:

SAN JOAQUIN VALLEY UNIFIED APCD 1999 Tuolumne Street, Suite 200 Fresno, CA 93721





# PERMIT TO OPERATE

PERMIT NO: C-1659-41-0

EXPIRATION DATE: 03/31/1998

LEGAL OWNER OR OPERATOR: UNOCAL CORPORATION MAILING ADDRESS: P.O. BOX 1074 COALINGA, CA 93210

LOCATION: GAS PRODUCTION, FRESNO COUNTY SECTION 7 TOWNSHIP 19S RANGE 15E

### **EQUIPMENT DESCRIPTION:**

36.2 MMBTU/HR SOLAR/SATURN NATURAL GAS FIRED GAS TURBINE CTO DRIVE A 1150 HP GAS COMPRESSOR.

### CONDITIONS

- 1. 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 dark or darker than Ringelmann 1 or equivalent to 20% opacity.
- 2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration.
- 3. Natural gas consumption rate shall not exceed 826,500 scf per day.
- 4. Equipment may only be fueled by natural gas.
- 5. Emissions shall not exceed 248 lb NOx/day (10.33 lb/hr), 99.2 lb CO day (4.13 lb/hr), nor 19.0 lb VOC/day (0.80 lb/hr).
- 6. A record of daily fuel consumption shall be maintained, retained on the premises for a period of at least two years and made available for District inspection upon request.

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

### DAVID L. CROW

#### Executive Director/APCO



# PERMIT TO OPERATE

PERMIT NO: C-1659-40-0

EXPIRATION DATE: 03/31/1998

LEGAL OWNER OR OPERATOR: UNOCAL CORPORATION MAILING ADDRESS: P.O. BOX 1074 COALINGA, CA 93210

LOCATION: GAS PRODUCTION, FRESNO COUNTY SECTION 7 TOWNSHIP 19S RANGE 15E

### **EQUIPMENT DESCRIPTION:**

36.2 MM BTU/HR SOLAR/SATURN NATURAL GAS FIRED TURBINE B TO DRIVE A 1150 HP GAS COMPRESSOR.

### CONDITIONS

- 1. 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 dark or darker than Ringelmann 1 or equivalent to 20% opacity.
- 2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration.
- 3. Natural gas consumption rate shall not exceed 826,500 scf per day.
- 4. Equipment may only be fueled by natural gas.
- 5. Emissions shall not exceed 248 lb NOx/day (10.33 lb/hr), 99.2 lb CO day (4.13 lb/hr), nor 19.0 lb VOC/day (0.80 lb/hr).
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### DAVID L. CROW

#### Executive Director/APCO



# PERMIT TO OPERATE

PERMIT NO: C-1659-39-0

EXPIRATION DATE: 03/31/1998

LEGAL OWNER OR OPERATOR: UNOCAL CORPORATION MAILING ADDRESS: P.O. BOX 1074 COALINGA, CA 93210

LOCATION: GAS PRODUCTION, FRESNO COUNTY

### **EQUIPMENT DESCRIPTION:**

36.2 MM BTU/HR SOLAR/SATURN NATURAL GAS FIRED TURBINE A TO DRIVE A 1150 HP GAS COMPRESSOR.

### CONDITIONS

- 1. 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 dark or darker than Ringelmann 1 or equivalent to 20% opacity.
- 2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration.
- 3. Natural gas consumption rate shall not exceed 826,500 scf per day.
- 4. Equipment may only be fueled by natural gas.
- 5. Emissions shall not exceed 248 lb NOx/day (10.33 lb/hr), 99.2 lb CO day (4.13 lb/hr), nor 19.0 lb VOC/day (0.80 lb/hr).
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### DAVID L. CROW

#### Executive Director/APCO

### AIR POLLUTION CONTROL DISTRICT FEES

FACILITY I.D. # 1659

•

LOCATION: Natural Gas Production, Fresno County

BILLING FOR: FILING FEES

BILLING DATE: June 8, 1994

TOTAL FEES	\$	650.00
CREDIT	<u>\$</u>	<u>180.00</u>
BALANCE DUE	\$	470.00

### THE ABOVE TOTALS ARE BASED ON THE FOLLOWING ITEMIZED LISTING

APPLICATION	FEE	DESCRIPTION
C-1659-68-0	650.00	Emission Reduction Credit for Shut
		Down of Three Gas Turbines

PLEASE RETURN A COPY OF THIS BILL WITH THE AMOUNT DUE WITHIN 30 DAYS TO:

SAN JOAQUIN VALLEY UNIFIED APCD 1999 Tuolumne Street, Suite 200 Fresno, CA 93721



June 12, 1996

George N. Folks, Jr. Unocal P.O. Box 1074 Coalinga, CA 93210

RE: Notice of Final Action - Emissions Reduction Credit Certificates Project #950579

Dear Mr. Folks:

The District has made its Final Decision to issue Emission Reduction Credit Certificates to Unocal for the shutdown of three natural gas fired turbines located on Calaveras Ave, SW 1/4 Sec 7, T19s, R16e, Coalinga, CA. Certificate #'s C-0110-1, C-0110-2, and C-0110-3 are enclosed.

Also enclosed is a copy of the Notice of Final Action which will be published approximately three days from the date of this letter. All relevant comments received within the 30-day public comment period have been addressed and incorporated into the application review.

Thank you for your cooperation in this matter. Should you have any questione, please contact David Warner, Permit Services Manager - Central Region at (209) 497-1100.

Sincerely,

Seyed Sadredin Director of Permit Services

JR/ad Enclosures **Certified Mail #** z 198 113 806 c: David Warner, Permit Servíces Manager - Central Region

> David L. Crow Executive Director/Air Pollution Control Officer 1999 Tuolumne Street, Suite 200 Fresno, CA 93721 • (209) 497-1000 • FAX (209) 233-2057

Northern Region

Central Region 1999 Tuolumne Street, Suite 200 • Fresno, CA 93721 (209) 497-1000 • FAX (209) 233-2057 Southern Region 2700 M Street, Suite 275 • Bakersfield, CA 9 1. (805) 862-5200 • FAX (805) 862-5201



June 12, 1996

Raymond Menebroker, Chief Project Assessment Branch Stationary Source Division California Air Resources Board P.O. Box 2815 Sacramento, CA 95812-2815

### RE: Notice of Final Action - Emission Reduction Credit Certificates Project #950579

Dear Mr. Menebroker:

The District has made its Final Decision to issue Emission Reduction Credit Certificates to Unocal for the shutdown of three natural gas fired turbines located on Calaveras Ave, SW 1/4 Sec 7, T19s, R16e, Coalinga, CA. Copies of Certificate #'s C-0110-1, C-0110-2, and C-0110-3 are enclosed.

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> David L. Crow Executive Director/ Air Pollution Control Officer 1999 Tuolumne Street, Suite 200 Fresno, CA 93721 • (209) 497-1000 • FAX (209) 233-2057

Northern Region 12 Covernan Avenue, Suite 130 • Modesto, CA 95356 - 039/545-7000 • FAX (209) 545-8652 Central Region 1999 Tuolumne Street, Suite 200 • Fresno, CA 93721 (209) 497-1000 • FAX (209) 233-2057 Southern Region 2700 M Street, Suite 275 • Bakersfield, CA 91. (805) 862-5200 • FAX (805) 862-5201



June 12, 1996

Ken Bigos, Chief New Source Section U.S. E.P.A. - Region IX 75 Hawthorne Street San Francisco, CA 94105

### RE: Notice of Final Action - Emission Reduction Credit Certificates Project #950579

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JR/ad Enclosures c: David Warner, Permit Services Manager - Central Region

> David L. Crow Executive Director/Air Pollution Control Officer 1999 Tuolumne Street, Suite 200 Fresno, CA 93721 • (209) 497-1000 • FAX (209) 233-2057

Northern Region 4230 K aman Avenue, Suite 130 • Modesto, CA 95356 (203) 543-7000 • FAX (209) 545-8652 Central Region 1999 Tuolumne Street, Suite 200 • Fresno, CA 93721 (209) 497-1000 • FAX (209) 233-2057 Southern Region 2700 M Street, Suite 275 • Bakersfield, CA 9 ; (805) 862-5200 • FAX (805) 862-520 \* Fresno Bee

### NOTICE OF FINAL ACTION FOR THE ISSUANCE OF EMISSION REDUCTION CREDIT CERTIFICATES

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District has issued Emission Reduction Credit Certificate to Unocal for the shutdown of three natural gas fired turbines located on Calaveras Ave, SW 1/4 Sec 7, T19s, R16e, Coalinga, CA. The quantities of emission reduction are 6,993 lb of VOC/year; 45,257 lb of NOx/year; and 36,487 lb of CO/year.

The analysis of the regulatory basis for Project #950579, and of the resulting effect on ambient air quality, is available for public inspection at SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, CENTRAL REGION, 1999 TUOLUMNE STREET, SUITE 200, FRESNO, CA 93721.



Central Regional Office \* 1999 Tuolumne St., Suite 200 \* Fresno, CA 93721

# Emission Reduction Credit Certificate C-0110-1

<b>Issued To:</b>	Union Oil of California dba UNOCAL
<b>Issue Date:</b>	June 12, 1996

Location of Reduction:

Calaveras Ave, SW 1/4 Sec 7, T19s, R16e, Coalinga, CA

### For VOC Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
1,581 lbs	1,748 lbs	1,909 lbs	1,755 lbs

[ ] Conditions Attached

### Method Of Reduction

- [ ] Shutdown of Entire Stationary Source
- [ ] Shutdown of Emissions Unit
- [X] Other: Shutdown of three natural gas fired turbines (PTO #'s C-1659-39-0, C-1659-40-0, & C-1659-41-0).

David L. Crow, APCO

Seyed Sadredin Director of Permit Services



Central Regional Office \* 1999 Tuolumne St., Suite 200 \* Fresno, CA 93721

# Emission Reduction Credit Certificate C-0110-3

Issued To:	Union Oil of California dba UNOCAL
Issue Date:	June 12, 1996
Location of Reduction:	Calaveras Ave, SW 1/4 Sec 7, T19s, R16e Coalinga, CA

### For CO Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
8,246 lbs	9,122 lbs	9,961 lbs	9,158 lbs

[ ] Conditions Attached

Method Of Reduction

- [ ] Shutdown of Entire Stationary Source
- [ ] Shutdown of Emissions Unit
- [X] Other: Shutdown of three natural gas fired turbines (PTO #'s C-1659-39-0, C-1659-40-0, & C-1659-41-0).

David L. Crow, APCO

Seyed Sadredin Director of Permit Services



Central Regional Office \* 1999 Tuolumne St., Suite 200 \* Fresno, CA 93721

# Emission Reduction Credit Certificate C-0110-2

Issued To:	Union Oil of California dba UNOCAL
Issue Date:	June 12, 1996
Location of Reduction:	Calaveras Ave, SW 1/4 Sec 7, T19s, R16e Coalinga, CA

### For NOx Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
10,228 lbs	11,314 lbs	12,355 lbs	11,360 lbs

[ ] Conditions Attached

**Method Of Reduction** 

- [ ] Shutdown of Entire Stationary Source
- [ ] Shutdown of Emissions Unit
- [X] Other: <u>Shutdown of three natural gas fired turbines (PTO #'s C-1659-39-0, C-1659-40-0, &</u> <u>C-1659-41-0).</u>

David L. Crow, APCO

Seyed Sadredin Director of Permit Services

6/12/96



April 26, 1996

George N. Folks, Jr. Unocal P.O. Box 1074 Coalinga, CA 93210

### Re: Preliminary Public Notice - Emission Reduction Credit Certificates Project # 950579

Dear Mr. Folks:

Enclosed for your review and comment is the District's revised analysis of Unocal's request for Emission Reduction Credits resulting from the shutdown of three natural gas fired turbines located on Calaveras Ave, SW 1/4 Sec 7, T19s, R16e, Coalinga, CA. The quantities of emission reduction are 6,993 lb of VOC/year; 45,257 lb of NOx/year; and 36,487 lb of CO/year.

Also enclosed is a copy of the Preliminary Public Notice for this project which will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day public comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. Should you have any questions, please contact George Heinen of Permit Services at (209) 497-1100.

Sincerely,

Seyed Sadredin Director of Permit Services

GAH Enclosures c: David Warner, Permit Services Manager - Central Region

> David L. Crow Executive Director/Air Pollution Control Officer

1999 Tuolumne Street, Suite 300 • Fresho, CA 93721 • (209) 497-1000 • F4X, 209: 233-2161

Northern Region

**Central Region** 

Southern Region

4230 Kiernan Avenue, Suite 130 • Modesto, CA 95355 (209) 545-7020 • Fax (209) 545-8652

1999 Columne Street, Suite 200 • Fresho, CA 93721 2091 497/1000 • Fax (209) 233-2057 2700 M Street, Suite 275 • Bakerstie ± 04 99301 905 861/3682 • Fax (605 861/0160



April 26, 1996

Ken Bigos, Chief New Source Section US EPA - Region IX 75 Hawthorne Street San Francisco, CA 94105

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1999 Tuolumne Street, Suite 200 • Fresho, CA 93721 • (209) 497-1000 = F4% (209) 233-2057

#### Northern Region

4230 Kiernan Avenuel Suite 130 • Modesto, CA 95356 (209) 545-7000 • Fax (209) 545-8652 **Central Region** 

Southern Region

1999 Tuplumne Street, Suite 200 • Fresholl CA 93721 (209) 497-1000 • Fax (209) 233 2057 2700 M Street Suite 275 • Ballenine ol (24.93301 805-861-3682 • Fax (405.361,0060



April 26, 1996

Raymond Menebroker, Chief Project Assessment Branch Stationary Source Division California Air Resources Board P.O. Box 2815 Sacramento, CA 95812-2815

### Re: Preliminary Public Notice - Emission Reduction Credit Certificates Project # 950579

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Enclosed for your review and comment is the District's revised analysis of Unocal's request for Emission Reduction Credits resulting from the shutdown of three natural gas fired turbines located on Calaveras Ave, SW 1/4 Sec 7, T19s, R16e, Coalinga, CA. The quantities of emission reduction are 6,993 lb of VOC/year; 45,257 lb of NOx/year; and 36,487 lb of CO/year

Also enclosed is a copy of the Preliminary Public Notice for this project which will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day public comment period which begins on the date of publication of the public notice.

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Sincerely,

Seyed Sadredin Director of Permit Services

GAH Enclosures c: David Warner, Permit Services Manager - Central Region

Executive Director/Air Pollution Control Officer

1999 Tuolumine Street, Suite 200 • Fresho, CA 93/21 • (209) 497(1000 • F4) (219) 233(2057

#### Northern Region

4230 K ernan Avenuel Suite 130 • Modestol CA 95356 (209) 545-7000 • Fax (209) 545-8652 Central Region 1999 Tublum re Street, Suite 200 • Fresholl CA 93721 Southern Region

uciumne street, Suite 200 • Frasho 104 93721 1259 1397-1000 • Fax (2091 233-2557 2700 M Sweet Sure 275 • Bakersteid, 04 93301 4805 861/3862 • Fax 805 861/0060 Fresno Bee

### NOTICE OF PRELIMINARY DECISION FOR THE PROPOSED ISSUANCE OF EMISSION REDUCTION CREDIT CERTIFICATES

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credit Certificates to Unocal for the shutdown of three natural gas fired turbines located on Calaveras Ave, SW 1/4 Sec 7, T19s, R16e, Coalinga, CA. The quantities of emission reduction are 6,993 lb of VOC/year; 45,257 lb of NOx/year; and 36,487 lb of CO/year.

The analysis of the regulatory basis for these certificates, and of the resulting effect on ambient air quality, is available for public inspection at the District office at the address below. Written comments on Project # 950579 must be submitted within 30 days of the publication date of this notice to SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, CENTRAL REGION, 1999 TUOLUMNE STREET, SUITE 200, FRESNO, CA 93721.

### ERC Application Evaluation Project # 950579

Engineer: G.A. Heinen Date: April 22, 1996

Facility:Union Oil Company of California DBA Unocal (Fac # 1659)Address:P.O. Box 1074Coalinga, CA 93210

Contact Name: George Folks, Jr Phone: (209) 935-7225

Date Application Received: September 28, 1995 Date Deemed Complete: October 12, 1995

**Note:** This evaluation supersedes the evaluation dated January 16, 1996. During the public notice period, the applicant commented that the turbines had been improperly rated on the Permit to Operate (PTO). The PTO rating of 36.2 MMBtu/hr is incorrect and the engines are actually rated 1100 hp or approximately 13.3 MMBtu/hr. The revised rating changes the allowable emission factors for NOx and CO.

Also, Richard Miller, of the California Air Resource Board, commented that the stochiometric calculations were incorrectly based on percent excess oxygen. District Rule 4703, Stationary Gas Turbines, bases emissions on the percent oxygen in the exhaust gas stream. Therefore, this revised evaluation recalculates the emission reduction credits based on the correct turbine emission factors and stochiometric calculation.

### I. SUMMARY:

The primary business of this facility is natural gas production, treatment and transportation. The applicant permanently shutdown three gas turbines, [Permits To Operate (PTO) C-1659-39-0, C-1659-40-0 and C-1659-41-0 (Appendix A)], and requests Emission Reduction Credit (ERC) certificates for the decreased emissions. The facility was formally shutdown on September 28, 1995 when the PTO were surrendered to the District, in accordance with District Policy NSR/ERC 7.

### II. APPLICABLE RULES:

Rule 2301 - Emission Reduction Credit Banking (Adopted Sept 19, 1991; Last Amended Dec 17, 1992)

### III. LOCATION OF REDUCTION:

Calaveras Ave, SW 1/4 Sec 7, Township 19S, Range 16E Coalinga, CA

### IV. METHOD OF GENERATING REDUCTION:

The facility was permitted to operate three natural gas-fired turbines to drive natural gas compressors. Emissions from each turbine were created from the combustion of natural gas fuel in the turbines. Unocal permanently ceased operation of this equipment and formally surrendered the PTOs with the application on September 28, 1995.

### V. CALCULATIONS:

### A. Assumptions and Emission Factors

The PTOs limit each turbine to 826,500 scf of natural gas per day. Each turbine was also limited to 248 lb NOx/day (10.33 lb/hr), 99.2 lb CO/day (4.13 lb/hr). and 19.0 lb VOC/day (0.80 lb/hr). These natural gas and emission limits produce the emission factors shown in Table 1.

Pollutant	Emission limit (lb/day)	Fuel Limit (kcf/day)	Emission Factor (lb/kcf)
NOx	248	826.5	0.300
со	99.2	826.5	0.120
VOC	19.0	826.5	0.023

### **Table 1: Emission Factor Calculations**

Note: Emissions of PM10 and SOx are negligible and ERC are not requested for these pollutants. Therefore, only the three pollutants indicated will be addressed by this analysis. These turbines have never been source tested but the calculated emission factors match those from AP-42 Table 3.2-1, Heavy Duty Natural Gas Fired Pipeline Compressor Engines, and are therefore considered valid.

Rule 2201, section 6.5, requires a 75% reduction of the Actual Emission Reduction (AER) for early implementation of a Best Available Retrofit Control Technology (BARCT) requirement. This project does not meet the definition of early implementation (section 3.2.2), which requires the ERC application to be deemed complete before the regulatory measure is placed on the annual list of control measures scheduled. In this case, the application was deemed complete on October 12, 1995 which is after the last amendment of Rule 4703 on March 16, 1995. Based on the above, this is not an early implementation of a BARCT requirement and therefore the reductions must be fully discounted as required by Rule 4703, section 5.3.1.

The turbines are each rated at 1100 hp each which converts to a MW rating of

MW = 1,100 hp x 0.746 kW/hp x 1 MW/1,000 kW = 0.82 MW

Rule 4703, section 5.3.1 limits ERC for 1100 hp Solar Saturn turbines to NOx reductions below those emissions indicated in section 5.1.1. For a turbine rated from 0.3 to 10.0 MW, the required emission limit is 42 ppm NOx @ 15% oxygen (for gas firing). Per section 5.2, the CO limit is 250 ppm CO @ 15% oxygen.

Therefore, only reductions below these levels will be eligible for banking.

### B. Baseline Period Determination and Data

The baseline period may consist of either two years immediately preceding the submission of a complete application or at least two consecutive years within the five years prior to that date if deemed more representative of "normal source operations" (Rule 2201, section 3.7). The application was received September 28, 1995, so the five-year period runs from September 28, 1990 to September 28, 1995.

The applicant provided the fuel use data shown in Appendix B. Using this data, the annual fuel use average from 1992 to 1987 is 324,169,333 scf of natural gas/year.

It is reasonable to use the multiple-year average to represent normal source operations. The 1993 data was not included in the calculations since it represents only a partial year's fuel use, and is therefore not representative of normal source operations. The baseline period which most closely matches the normal source operations is from October 1, 1990 to September 30, 1992. For that period, the average fuel use is 337,840,000 scf/year.

The PTO limits each turbine to 826,500 scf/day. This is equals an annual permitted fuel use limit of

PTO fuel = 3 turbines x 826,500 scf/day/turbine x 365 days/year = 905,017,500 scf/year

Therefore, the calculated average actual annual fuel use of 337,840,000 is less than the permitted level and will be used for the Historical Actual Emissions calculations.

### C. Historical Actual Emissions (HAE)

Historical Actual Emissions are emissions having actually occurred and are calculated using process data and recognized emission factors (Rule 2201 section 6.2.1). In this case, the actual annual fuel usage is multiplied by the emission limits or factor calculated in Section V.A.

### 1. Assumptions:

a. As shown in Appendix C, for every cubic foot of natural gas burned, the amount of exhaust air, at 15% excess O<sub>2</sub>, is found to be

Exhaust(dry) = 29.8 cf total exhaust air

- b. Atmospheric pressure (P) = 14.7 lbf/si x 144 si/sf = 2,117 lbf/sf
- c. Molecular weight (MW) of NOx = 46 lb/lb-mol Molecular weight (MW) of CO = 28 lb/lb-mol

### 2. VOC emission calculation:

Using the emission factor from Table 1, annual VOC emissions are

HAE(VOC) = 337,840,000 cf/yr x 0.023 lb VOC/1,000 cf = 7,770 lb VOC/year.

### 3. NOx emission calculation:

The annual NOx emissions are based on the allowable exhaust concentration limit of 42 ppm NOx. In this case, the volume of exhaust is equal to 29.8 times the volume of gaseous fuel supplied. This produces a NOx volume of

NOx = (337,840,000 cf<sub>nat gas</sub>/yr) x (29.8 cf<sub>exhaust</sub>/cf<sub>nat gas</sub>) x 0.000042 cf<sub>NOx</sub>/cf<sub>exhaust</sub> = 422,840 cf<sub>NOx</sub> /year

The mass of the gas (m) can be found by using the Ideal Gas Law, (PV = nRT); setting n = m/MW; and solving for m. This produces

m = P x V x MW / (R x T)
= 2.117 lbf/sf x 422.840 cf/yr x 46 lb/lb-mol
(1,545 lbf-ft/lb-mol degrees R) x 530 degrees R
= 50.286 lb NOx/year = HAE(NOx)

The PTO NOx emission factor from Table 1 is 0.300 lb NOx/kcf. The calculated emission of 50,286 lb NOx/yr for 337,840 kcf of natural gas is equivalent to 0.149 lb NOx/kcf. The calculated emissions, based on Rule 4703, are less than the permitted NOx emission level and are valid for ERC calculation purposes.

### 4. CO emission calculation

The annual CO emissions are based on the allowable exhaust concentration limit of 250 ppm CO. In this case, the volume of exhaust is equal to 29.8 times the volume of gaseous fuel supplied. This produces a CO volume of

The mass of the gas (m) can be found by using the Ideal Gas Law, (PV = nRT); setting n = m/MW; and solving for m. This produces

The PTO CO emission factor from Table 1 is 0.120 lb CO/kcf. The calculated emission of 182,197 lb CO/yr for 337,840 kcf of natural gas is equivalent to 0.539 lb CO/kcf. The calculated emission factor, based on Rule 4703, is higher than the permitted emission factor and produces a calculated HAE(CO) greater than the permitted CO emission level. Therefore, the PTO emission factor shall be used for ERC calculation purposes.

Recalculating with the PTO emission factor and the actual average gas usage produces a HAE(CO) of

This amount shall be used for ERC calculation purposes.

### D. Actual Emission Reductions (AER)

Per Rule 2201, section 6.5.2, the actual emissions reductions due to shutdown of the permit units is

AER = HAE (for the units prior to shutdown)

### E. Air Quality Improvement Deduction (AQID)

On-site AERs which are to be banked must be reduced by a 10% the air quality improvement deduction (Rule 2201, section 6.5).

AQID(VOC) = 7,770 lb/year x 0.1 = 777 lb/year AQID(NOx) = 50,286 lb/year x 0.1 = 5,029 lb/yearAQID(CO) = 40,541 lb/year x 0.1 = 4,054 lb/year

### F. Adjustments to AER

Since the project is due to the shutdown of this equipment, there were no increased emissions associated with this action so no adjustments are required to the AER, other than those required by Rule 4703, as presented in the calculations section. The facility has no other ERC which would affect the AER.

### G. Bankable Emission Reduction Credits

The final ERC amounts are equal to the calculated actual emission reductions minus the air quality improvement deduction:

ERC = AER - AQID

ERC(VOC) = 7,770 lb/year - 777 lb/year = 6,993 lb/yearERC(NOx) = 50,286 lb/year - 5,209 lb/year = 45,257 ib/yearERC(CO) = 40,541 lb/year - 4,054 lb/year = 36,487 lb/year

These credits are based on fuel consumption which varies by calendar quarter. Using baseline data to obtain a ratio of average fuel per quarter to total annual fuel produces the following factors:

Q1: [(91,410,000 + 61,236,000)/2] / 337,840,000 = 0.226 Q2: [(90,237,000 + 78,827,000)/2] / 337,840,000 = 0.250 Q3: [(91,599,000 + 93,034,000)/2] / 337,840,000 = 0.273 Q4: [(90,225,000 + 79,111,000)/2] / 337,840,000 = 0.251

Applying these ratios to the annual ERC amounts and correcting for rounding errors produces the ERC quarterly distribution shown in Table 2:

Quarter	ERC factor	VOC (lb/qtr)	NOx (lb/qtr)	CO (lb qtr)
Q1	0.226	1,581	10,228	8,246
Q2	0.250	1,748	11,314	9,122
Q3	0.273	1,909	12,355	9,961
Q4	0.251	1,755	11,360	9,158
Total (lb/yr)		6,993	45,257	36,487

Table 2: ERC Distribution By Quarter

### VI. COMPLIANCE:

To comply with the definition of Actual Emissions Reductions (Rule 2201, section 3.2.1) the reductions must be:

<u>Real</u> - The emissions reductions were generated by the shutdown of fuel burning equipment. The equipment has been removed from service and is in the process of being sold. Emission reductions were calculated from actual fuel use data, recognized emission factors, and current Rule 4703 emission limits. Therefore, the reductions are real.

<u>Surplus</u> - Rule 4703 requires emissions from these turbines to be no greater than 42 ppm NOx and 250 ppm CO, and the emissions reductions have been adjusted accordingly. Shutdown of the turbines was voluntary and not required by any law, rule, agreement, or regulation. The emission reduction credits were not used for the approval of an Authority to Construct or as offsets. Therefore, the emissions reductions, as adjusted, are surplus.

<u>Permanent</u> - The turbines have been shutdown and the PTOs have been surrendered. Further operations cannot legally occur without a PTO. Therefore, the reductions are permanent.

<u>Quantifiable</u> - Reduction amounts were calculated from historic fuel use data, PTO emission factors, Rule 4703 emission limits, and with methods according to District Rule 2201. Therefore, the emissions are quantifiable.

<u>Enforceable</u> - The PTOs for these units have been surrendered and they cannot be operated without valid PTOs. Therefore, the reductions are enforceable.

<u>Timely submittal</u> - Rule 2301, section 5.5 requires application submittal within 180 days of the emission reduction. The ERC application was received September 28, 1995. That is also the date on which the permits were surrendered. Although the equipment has been idle, the permits were kept current and the turbines remained operable prior to the date of the application. The date of reduction is therefore the date of the surrender of the permits pursuant to District Policy NSR/ERC 7. Therefore, the application is timely.

Adjustments for RACT and BARCT: The emissions have been adjusted to comply with the BARCT emission requirements of Rule 4703.

### VII. RECOMMENDATION:

Recommend, based on the analysis above, that an Emission Reduction Credit Certificate be issued to UNOCAL in the amounts as shown in Table 2.

Appendices

- A Permits To Operate
- B Annual Fuel Use Data
- C Stoichiometric Calculations

Appendix A

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# PERMIT TO OPERATE

PERMIT NO: C-1659-41-0

### EXPIRATION DATE: 03/31/1998

LEGAL OWNER OR OPERATOR: UNOCAL CORPORATION MAILING ADDRESS: P.O. BOX 1074 COALINGA, CA 93210

LOCATION: GAS PRODUCTION, FRESNO COUNTY SECTION 7 TOWNSHIP 19S RANGE 15E

**EQUIPMENT DESCRIPTION:** 

36.2 MMBTU/HR SOLAR/SATURN NATURAL GAS FIRED GAS TURBINE CTO DRIVE A 1150 HP GAS COMPRESSOR.

### CONDITIONS

- 1. 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 dark or darker than Ringelmann 1 or equivalent to 20% opacity.
- 2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration.
- 3. Natural gas consumption rate shall not exceed 826,500 scf per day.
- 4. Equipment may only be fueled by natural gas.
- 5. Emissions shall not exceed 248 lb NOx/day (10.33 lb/hr), 99.2 lb CO day (4.13 lb/hr), nor 19.0 lb VOC/day (0.80 lb/hr).
- 6. A record of daily fuel consumption shall be maintained, retained on the premises for a period of at least two years and made available for District inspection upon request.

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

### DAVID L. CROW

Executive Director/APCO



# PERMIT TO OPERATE

PERMIT NO: C-1659-40-0

EXPIRATION DATE: 03/31/1998

LEGAL OWNER OR OPERATOR: UNOCAL CORPORATION MAILING ADDRESS: P.O. BOX 1074 COALINGA, CA 93210

LOCATION: GAS PRODUCTION, FRESNO COUNTY SECTION 7 TOWNSHIP 19S RANGE 15E

**EQUIPMENT DESCRIPTION:** 

36.2 MM BTU/HR SOLAR/SATURN NATURAL GAS FIRED TURBINE B TO DRIVE A 1150 HP GAS COMPRESSOR.

### CONDITIONS

1. 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 dark or darker than Ringelmann 1 or equivalent to 20% opacity.

2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration.

- 3. Natural gas consumption rate shall not exceed 826,500 scf per day.
- 4. Equipment may only be fueled by natural gas.
- 5. Emissions shall not exceed 248 lb NOx/day (10.33 lb/hr), 99.2 lb CO day (4.13 lb/hr), nor 19.0 lb VOC/day (0.80 lb/hr).
- 6. A record of daily fuel consumption shall be maintained, retained on the premises for a period of at least two years and made available for District inspection upon request.

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

### DAVID L. CROW

#### Executive Director/APCO



# PERMIT TO OPERATE

PERMIT NO: C-1659-39-0

EXPIRATION DATE: 03/31/1998

LEGAL OWNER OR OPERATOR: UNOCAL CORPORATION MAILING ADDRESS: P.O. BOX 1074 COALINGA, CA 93210

LOCATION: GAS PRODUCTION, FRESNO COUNTY

### **EQUIPMENT DESCRIPTION:**

36.2 MM BTU/HR SOLAR/SATURN NATURAL GAS FIRED TURBINE A TO DRIVE A 1150 HP GAS COMPRESSOR.

### CONDITIONS

- 1. 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 dark or darker than Ringelmann 1 or equivalent to 20% opacity.
- 2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration.
- 3. Natural gas consumption rate shall not exceed 826,500 scf per day.
- 4. Equipment may only be fueled by natural gas.
- 5. Emissions shall not exceed 248 lb NOx/day (10.33 lb/hr), 99.2 lb CO day (4.13 lb/hr), nor 19.0 lb VOC/day (0.80 lb/hr).
- 6. A record of daily fuel consumption shall be maintained, retained on the premises for a period of at least two years and made available for District inspection upon request.

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

### DAVID L. CROW

#### Executive Director/APCO

Appendix B

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### ANNUAL FUEL USE DATA

(Total fuel, in 1,000 scf, used by the three turbines)

1995	idle
1994	idle
1993	195,669 (idle for five months
1992	368,846
1991	323,322
1990	325,270
1989	302,372
1988	303,854
1987	321,352

· · ·

No data is available for fuel use prior to 1987.

Total fuel used (1992 to 1987, inclusive): 1,945,016,000 scf Average fuel use = 1,946,016,000 scf / 6 years = 324,169,333 scf/year

### MONTHLY FUEL USE DATA

(Total fuel, in 1,000 scf, used by the three turbines)

	1993	_1992	<u>    1991</u>	<u>1990</u>
lonuon	21 020	20 506	22.450	
January	31,029	29,590	22,400	
February	25,770	30,540	18,135	
March	<u>28,028</u>	<u>31,274</u>	<u>20.651</u>	
1st Qtr	85,627	91,410	61,236	
April	29,075	31,162	28,205	
May	27,137	30,410	24,793	
June	27.640	28,665	25,829	
2nd Qtr	83,852	90,237	78,827	
July	26,190	31,354	32,031	
August	idle	30,225	31,231	24,960
September	idle	30,020	29,772	25.135
3rd Qtr		91,599	93,034	
October	idle	31,281	31,361	25,596
November	idle	31,053	27,187	25,590
December	idle	33,266	31,677	27,925
4th Qtr		95,600	90,225	79,111

Appendix B

page 1 of 1

Appendix C

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### Stoichiometric Calculations

1. Assumptions:

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1. Natural gas is primarily methane, (CH<sub>4</sub>)

2. Ambient atmosphere consists of roughly 79% Nitrogen ( $N_2$ ) to 21% Oxygen ( $O_2$ ) or one mole of  $O_2$  to every 3.76 moles of  $N_2$ .

2. Stoichiometric combustion of natural gas:

 $CH_4 + 2O_2 + 2(3.76)N_2 = CO_2 + 2H_2O + 7.52N_2$ 

3. Combustion of gas with "e" amount of excess oxygen in the exhaust

 $CH_4 + 2O_2 + 2(3.76)N_2 = CO_2 + 2H_2O + 7.52N_2 + eO_2 + e(3.76)N_2$ 

4. A cubic foot (cf) of natural gas burns to produce

 $CH_4 + 2O_2 + 2(3.76)N_2 = 1 \text{ cf } CO_2 + 7.52 \text{ cf } N_2 + e \text{ cf } O_2 + e(3.76) \text{ N2} + \text{H2O}$ = 8.52 cf exhaust (dry) + e(4.76) air (dry)

5. The turbine emissions must be corrected to 15% oxygen (Rule 4703, section 5.1). This equates to

e = 0.15 [total exhaust] e = 0.15 [8.52 cf exhaust (dry) + e(4.76) air (dry)] e = 1.278 + e0.714 e = 4.47

6. Therefore, at 15% oxygen, combustion of one cf of natural gas produces

Exhaust(dry) = 8.52 cf exhaust + 4.47 cf excess O<sub>2</sub> + 4.47(3.76) cf excess N<sub>2</sub> = 29.8 cf total exhaust air per cf of natural gas burned

	SJVU	APCD			
******	ATTN	FINANCE	DEPARTN	IENT	
-1111	1999	TUOLUMNE	STREET	#200	
	FRESI	10		CA	93721

### **PROOF OF PUBLICATION**

# COUNTY OF FRESNO STATE OF CALIFORNIA

### EXHIBIT A.

PUBLIC NOTICE

A43021 NOTICE OF THELMINIARY DECISION FOR THE PROPOSED INSLANCE OF ISSION REDUCTION. CARDIN CENTRATE

NOTICE IS HITERY GIVEN from the ligh Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed basisnes of Emission Rehitigfion Criedil Certificatesto Unique for the platitiours of three particle gas final trafficatesto Control on Colournes Ave. SW 1/4 Sec 7, 1196, Rider Cardinas, CA. The grantities of emission reduction are 5,993 th of VOC/yeer; 45,217 lb of NOX/year; and 36,487 lb of CO/year.

The enables of the regulatory basis for these confidences, and of the resulting effect on ambient as quality is peoplecile for public implements of the District Office of the address below, Written comments addresses the submitted within 30 days of the publication date of this notice to: SAN JOAQUIN VALLET UNHERD ARE FOLLUTION CONTROL DISTRICT, CENTRAL REGION, 1999 TUOLUANE STREET, SUITE 200, RESNO, CA 93721

(May 1, 1996)

The undersigned states:

McClatchy Newspapers in and on all dates herein stated was a corporation, and the owner and publisher of The Fresno Bee.

The Fresno Bee is a daily newspaper of general circulation now published, and on all-the-dates herein stated was published in the City of Fresno, County of Fresno, and has been adjudged a newspaper of general circulation by the Superior Court of the County of Fresno, State of California, under the date of November 22, 1994, Action No. 520058-9.

The undersigned is and on all dates herein mentioned was a citizen of the United States, over the age of twenty-one years, and is the principal clerk of the printer and publisher of said newspaper; and that the notice, a copy of which is hereto annexed, marked Exhibit A, hereby made a part hereof, was published in The Fresno Bee in each issue thereof (in type not smaller than nonpareil), on the following dates.

MAY 1, 1996

Beginning	on the	day of		19,	
to the	day	of	19	inclusive.	

I certify (or declare) under penalty of perjury that the foregoing is true and correct.



FROM: RICH MILLER

1.

7.

	Post-It" brand fax transmittal	memo 7671 #of pages > /
	To Beach Heinen	From Rich Mille
Stoichiometric	Co. Stymarco	Co. ARB
	Dept. 2703	Phone # (216) 327-5618
	Fax (209) 233-2553	Pax# (216) # 945-5023

\_ \_ /

#### Assumptions:

1. Natural gas is primarily methane, (CH<sub>4</sub>)

- 2. Ambient atmosphere consists of roughly 79% Nitrogen  $(N_2)$  to 21% Oxygen  $(O_2)$  or one mole of  $O_2$  to every 3.76 moles of  $N_2$ .
- 2. Stoichiometric combustion of natural gas:

 $CH_4 + 2O_2 + 2(3.76)N_2 = CO_2 + 2H_2O + 7.52N_2$ 

3. Combustion of gas with e amount of excess air

$$CH_4 + 2O_2 + 2(3.76)N_2 = CO_2 + 2H_2O + 7.52N_2 + eO_2 + e(7.52)N_2$$

. A cubic foot (cf) of natural gas burns to produce

 $CH_4 + 2O_2 + 2(3.76)N_2 = 1 \text{ cf } CO_2 + 7.52 \text{ cf } N_2 + e(8.52) \text{ air } + \text{ water vapor}$ = 8.52 cf exhaust (dry) + e(8.52) air (dry)

5. The equation must be corrected to 15% excess oxygen (Rule 4703, section 5.1). That requires that

amount of excess oxygen = 0.15 stoichiometric amount of oxygen =  $(0.15 \times 2 \text{ cf } 0_2)$  per cf of natural gas = 0.30 cf  $0_2$  per cf of natural gas

6. Since there are 3.76 cf of  $N_2$  per cf of  $O_2$ , at 15% excess  $O_2$ , the

amount of excess nitrogen =  $3.76 \times 0.15$  stoichiometric amount of oxygen =  $(3.76 \times 0.15 \times 2 \text{ cf } 0_2)$  per cf of natural gas =  $1.13 \text{ cf } N_2$  per cf of natural gas

Therefore, at 15% excess oxygen, combustion of one cf of natural gas produces

Exhaust(dry) = 8.52 cf exhaust + 0.3 cf excess  $O_2$  + 1.13 cf excess  $N_2$ = 9.95 cf total exhaust air per cf of natural gas burned

To determine what e would be to result  
in 15% oxygen in the exhaust:  

$$0 = 0.15$$
  
 $1+7.52+e+3.76e$   
 $0 = 0.15+1.128+a.15e+0.564e$   
 $0 = 0.15+1.128+a.15e+0.564e$   
 $0 = 0.286e = 1.278$   
 $0 = 15\% 0e^{in} exhaut, one of (Hyperoduct
 $0 = 0.286e = 1.278$   
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 $0 = 0.286e$   
 $0 = 1.278 + 0.564e$   
 $0 = 0.15\% + 0.564e$   
 $0 = 0.286e$   
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 $0 = 0.5\% + 0.564e$   
 $0 = 0.15\% + 0.564e$   
 $0 = 0.286e$   
 $0 = 0.15\% + 0.564e$   
 $0 = 0.564e$   
 $0 = 0.286e$   
 $0 = 0.278e$   
 $0 = 0.286e$   
 $0 = 0.$$ 

FEB-28-1996 16:52 FROM

Unocal Energy Resources Division Unocal Corporation Calaveras Avenue, P.O. Box 1074 Coalinga, California 93210 Telephone (209) 935-0771

**UNOCAL**®

RECEIVED

February 16, 1996

FEB 2 0 1996 PERMIT SERVICES SJVUAPCD

Oil & Gas Operations North San Joaquin, Central California

> San Joaquin Valley Unified Air Pollution Control District Central Region Office 1999 Tuolumne Street, Suite 200 Fresno, California 93721

Attn: Mr. George Hinen

**Dear George:** 

As requested in our recent telephone conversation, please find the enclosed information which relates to project # 950579.

If you should require any further information, please call me at (209) 935-7225.

Sincerely

UNION OIL COMPANY OF CALIFORNIA

dba UNOCAL <u>ل</u>ہ۔ noa

George N. Folks Jr. Sr. Staff Environmental Specialist

Turbltr.doc

The operator stated that the efficiency (EFF) of these units is less than 25% so 25% will be used per Rule 4307, section 5.1. Section 5.3.1 limits ERC for 1100 hp Solar Saturn turbines to reductions below those emissions indicated in section 5.1. For a turbine greater than 10.0 MW, without SCR, the required emission limits are calculated as

42 NOx = 15 x EFF/25 42 42= 16 x 25/25 = 15 ppm NOx @ 15% oxygen. 250 CO = 46 x EFF/25 250 CO = 46 x 25/25 = 16 ppm ₩ @ 15% oxygen. 250

Therefore, only reductions <u>below</u> these levels will be eligible for banking.

B. Baseline Period Determination and Data

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The baseline period may consist of either two years immediately preceding the submission of a complete application or at least two consecutive years within the five years prior to that date if deemed more representative of "normal source operations" (Rule 2201, section 3.7). The application was received September 28, 1995, so the fiveyear period runs from September 28, 1990 to September 28, 1995.

The applicant provided the fuel use data shown in Appendix B. Using this data, the annual fuel use average from 1992 to 1987 is 324,169,333 scf of natural gas/year.

It is reasonable to use the multiple-year average to represent normal source operations. The 1993 data was not included in the calculations since it represents only a partial year's fuel use and is therefore not representative of normal source operations.

The baseline period which most closely matches the normal source operations is from October 1, 1990 to September 30, 1992. For that period, the average fuel use is 337,840,000 scf/year.

The PTO limits each engine to 826,500 scf/day. This is equals an annual permitted fuel use limit of

PTO fuel = 3 x 826,500 scf/day/engine x 365 days/year = 905,017,500

The calculated average actual annual fuel use of 337,840,000 is less than permitted and is therefore reasonable to use.

C. Historical Actual Emissions (HAE)

Historical Actual Emissions are emissions having actually occurred and are calculated using process data and recognized emission factors (Rule 2201 section 6.2.1). In this case, the actual annual fuel usage is multiplied by the emission limits or factor calculated in Section V.A.

Assumptions:

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1. As shown in Appendix C, for every cubic foot of natural gas burned, the amount of exhaust air, at 15% excess  $O_2$ , is found to be

Exhaust(dry) = 9.95 cf total exhaust air

- 2. Atmospheric pressure (P) = 14.7 lbf/si x 144 si/sf = 2,117 lbf/sf
- 3. Molecular weight (MW) of NOx = 46 lb/lb-mol Molecular weight (MW) of CO = 28 lb/lb-mol

VOC emission calculation:

HAE(VOC) = 337,840,000 cf/yr x 0.023 lb VOC/1,000 cf = 7,770 lb VOC/year.

NOx emission calculation:

 $NOx = (337,840,000 \text{ cf}_{nat gas}/\text{yr}) \times (9.95 \text{ cf}_{exhaust}/\text{cf}_{nat gas}) \\ \times 0.000015 \text{ cf}_{NOx}/\text{cf}_{exhaust} \\ = 50,423 \text{ cf}_{NOx} / \text{year}$ 

From the Ideal Gas Law, (PV = nRT), setting n = m/MWand solving for m, the mass of the gas:

m = P x V x MW / (R x T) 141,183 = 2,117 lbf/sf x 50,423 cf/yr x 46 lb/lb-mol (1,545 lbf-ft/lb-mol degrees R) x 530 degrees R = 5997 TD NOx/year = HAE(NOx) 16,790.62

25O

CO emission calculation

-

 $CO = (337,840,000 cf_{nat gas}/yr) \times (9.95 cf_{exhaust}/cf_{nat gas})$ x 0.000042 cf<sub>COx</sub>/cf<sub>exhaust</sub> =  $\frac{141,133}{840,377}$  cf<sub>COx</sub> /year

From the Ideal Gas Law, (PV = nRT), setting n = m/MW and solving for m, the mass of the gas:

 $m = P \times V \times MW / (R \times T)$ 

840,377

- 4.9814 2,117 lbf/sf x **141,105** cf/yr x 28 lb/lb-mol € m = (1,545 lbf-ft/lb-mol degrees R) x 530 degrees R= 818,850 = 10,222 lb COx/year = HAE(CO) 60,834
- D. Actual Emission Reductions (AER)

Per Rule 2201, section 6.5.2, the actual emissions reductions due to shutdown of the permit units is

AER = HAE (for the units prior to shutdown)

Air Quality Improvement Deduction (AQID) Ε.

> On-site AERs which are to be banked must be reduced by a 10% the air quality improvement deduction (Rule 2201, section 6.5).  $I_{0,790.62}$   $I_{0,790.62}$   $I_{0,790.62}$   $I_{0,790}$   $I_{0,790}$  6.5). = **107220** lb/year x 0.1 = **17022** lb/year ( AOID(CO) 60,834 6,083.40

Adjustments to AER F.

> Since the project is due to the shutdown of this equipment, there were no increased emissions associated with this action so no adjustments are required to the AER, other than those required by RUle 4703, as seen in the calculations section. The facility has no other ERC which would affect the AER.

Bankable Emission Reduction Credits G.

> 1679.00 ,15,111 16,790 ERC = AER - AQIDERC(VOC) = 7,770 lb/year - 777 lb/year = 6,993 lb/year  $ERC(NOx) = \frac{5,991}{10}$  lb/year -  $\frac{600}{10}$  lb/year =  $\frac{5,191}{10}$  lb/year  $= \frac{10,220}{60,834}$  lb/year -  $\frac{10,222}{60,834}$  lb/year =  $\frac{10,220}{54,750.60}$  lb/year ERC(CO)

> These credits are based on fuel consumption which varies by calendar quarter. Using baseline data to obtain a ratio of average fuel per quarter to total annual fuel produces the following factors:

Q1: [(91,410,000 + 61,236,000)/2] / 337,840,000 = 0.226 Q2: [(90,237,000 + 78,827,000)/2] / 337,840,000 = 0.250 Q3: [(91,599,000 + 93,034,000)/2] / 337,840,000 = 0.273Q4: [(90, 225, 000 + 79, 111, 000)/2] / 337, 840, 000 = 0.251

Applying these ratios to the annual ERC amounts and correcting for rounding errors produces the ERC quarterly distribution shown in Table 2:

10

Quarter	ERC factor	VOC (lb)	NOx (lb)	CO (lb)
Q1	0.226	1,581	1,220	2,079
Q2	0.250	1,748	1,349	2,299
Q3	0.273	1,909	1,473	2,511
Q4	0.251	1,755	1,355	2,309
	1.000	6,993	5,397	9,198

Table 2: ERC distribution by guarter

#### VI. Compliance:

To comply with the definition of Actual Emissions Reductions (Rule 2201, section 3.2.1) the reductions must be:

<u>Real</u> - The emissions reductions were generated by shutdown of fuel burning equipment. The equipment has been removed from service and is in the process of being sold. Emission reductions were calculated from actual fuel use data, recognized emission factors, and current Rule 4703 emission limits. Therefore, the reductions are real

<u>Surplus</u> - Rule 4703 requires emissions from these turbines to be no greater than ppm NOx and ppm CO, and the emissions reductions have been adjusted accordingly. Shutdown of the turbines was voluntary and not required by any law, rule, agreement, or regulation. The emission reduction credits were not used for the approval of an Authority to Construct or as offsets. Therefore, the emissions reductions, as adjusted, are surplus.

<u>Permanent</u> - The turbines have been shutdown and the PTOs have been surrendered. Further operations cannot legally occur without a PTO. Therefore, the reductions are permanent.

<u>Quantifiable</u> - Reduction amounts were calculated from historic fuel use data, PTO emission factors, Rule 4703 emission limits, and with methods according to District Rule 2201. Therefore, the emissions are quantifiable.

<u>Enforceable</u> - The PTOs for these units have been surrendered and they cannot be operated without valid PTOs. Therefore, the reductions are enforceable.

<u>Timely submittal</u> - Rule 2301, section 5.5 requires application submittal within 180 days of the emission reduction. The ERC application was received September 28, 1995. That is also the date on which the permits were surrendered. Although the equipment has been idle, the permits were kept current and the turbines remained operable on the date of the application. The date of reduction is therefore the date of the surrender of the permits pursuant to District Policy NSR/BACT 7. Therefore, the application is timely.

<u>Adjustments for RACT and BARCT:</u> The emissions have been adjusted to comply with the BARCT emission requirements of Rule 4703.

#### VII. Recommendation:

Recommend, based on the analysis above, that an Emission Reduction Credit Certificate be issued to UNOCAL in the amounts as shown in Table 2.

#### **Appendices**

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- A Permits To Operate
- B Annual Fuel Use Data
- C Stoichiometric Calculations

SOLAR TURBINES INCORPORATED SOLAR TURBINES INCORPORATEDDATE RUN: 8-MAY-95ENGINE PERFORMANCE CODEREV. 2.70RUN BY: MARKS, GERRIT J CUSTOMER: UNOCAL / Coalinga JOB ID: LA5-710

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SATURN 10-T1300 CS/MD STANDARD GAS TSC-2 REV. 0.0

### DATA FOR MINIMUM PERFORMANCE

Fuel Type	SD NATURAL	GAS
Elevation	Feet	850
Inlet Loss	in. H2O	3.0
Exhaust Loss	in. H2O	3.0
Accessory on GP	Shaft Hp	3.0

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Ambient Temperature	Deg. F	20.0	40.0	60.0	85.0	100.0	110.0
Relative Humidity	010	60.0	60.0	60.0	60.0	60.0	60.0
Elevation Loss	qH	44	43	41	37	35	33
Inlet Loss	Ч	20	20	2.0	19	18	18
Exhaust Loss	μ	10	10	10	10	10	10
Off-Optimum NPT Loss	Hp	10	9	7	3	1	0
Driven Equipment Spe	ed RPM	22300	22300	22300	22300	22300	22300
Optimum Equipment Sp	eed RPM	24451	24317	24094	23496	23054	22753
Gas Generator Speed	RPM	22523	22523	22523	22490	22490	22484
Specified Load	Нр	FULL	FULL	FULL	FULL	FULL	FULL
Net Output Power	Я́Н	1340	1291	1232	1123	1048	996
Fuel Flow M	MBtu/hr	14.93	14.57	14,15	13.30	12.73	12.36
Heat Rate Bt	u/Hp-hr	11147	11289	11480	11844	12151	12406
Inlet Air Flow	lbm/hr	52360	50713	48940	46292	44541	43264
Engine Exhaust Flow	lbm/hr	53085	51420	49626	46937	45159	43864
PCD	psi(g)	80.8	78.5	75.9	71.5	68.4	66.2
PT Inlet Temp. (T5)	Deg.F	1100	1123	1142	1150	1150	1150
Compensated PTIT	Deg. F	1100	1123	1142	1150	1150	1150
Exhaust Temperature	Deg. F	850	875	899	917	926	932