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ADMN. SERVICES  
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PROOF OF PUBLICATION

SJVUAPCD

ATTN FINANCE DEPARTMENT

1999 TUOLUMNE STREET #200

FRESNO, CA 93721



COUNTY OF FRESNO  
STATE OF CALIFORNIA

EXHIBIT A.

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.

*Jan. 13, 1999*

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.

Dated JANUARY 13, 1999

*Cathy Aquilera*

PUBLIC NOTICE  
#73000  
NOTICE OF FINAL ACTION  
FOR THE ISSUANCE OF  
EMISSION REDUCTION  
CREDITS

NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Texaco Exploration and Production, Inc. for emission reductions resulting from permanent shutdown of 13 natural gas-fired internal combustion engines at Sections 19F, 31B, and 24 of Township 19S, Range 15E in Coalingo, CA.

All comments received following the District's preliminary decision on this project were considered.

The application reviews for Project #970158 is available for public inspection at the SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 1999 TUOLUMNE STREET, SUITE 200, FRESNO, CA 93721.

January 13, 1999

Steve R.



San Joaquin Valley  
Unified Air Pollution Control District

January 7, 1999

Mike Polyniak  
Texaco Exploration and Production, Inc.  
Star Route Box 42  
San Ardo, CA 93450

**Re: Notice of Final Action - Emission Reduction Credits**  
**Project Number: 970158**

Dear Mr. Polyniak:

The Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Texaco Exploration and Production, Inc. for emission reductions resulting from permanent shutdown of 13 natural gas-fired internal combustion engines at Sections 19F, 31B, and 24 of Township 19S, Range 15E in Coalinga, CA.

Enclosed are the ERC Certificates and a copy of the notice of final action to be published approximately three days from the date of this letter.

All comments received following the District's preliminary decision on this project were considered.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. David Warner at (559) 497-1100.

Sincerely,

Seyed Sadredin  
Director of Permit Services

SS:SR/cl

Enclosures

c: David Warner, Permit Services Manager

David L. Crow  
Executive Director/Air Pollution Control Officer  
1999 Tuolumne Street, Suite 200, Fresno, CA 93721 (559) 497-1000 FAX (559) 233-2057

---

**Northern Region**

**Central Region**

**Southern Region**

4230 Kiernan Avenue, Suite 130, Modesto, CA 95356  
(209) 545-7000 FAX (209) 545-8652

1999 Tuolumne Street, Suite 200, Fresno, CA 93721  
(559) 497-1000 FAX (559) 233-2057

2700 M Street, Suite 275, Bakersfield, CA 93301  
(805) 862-5200 FAX (805) 862-5201

# SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT FEES

FACILITY I.D. #C-2885  
PROJECT #970158  
Texaco Exploration and Production, Inc.  
Star Route Box 42  
San Ardo, CA 93450

BILLING FOR: Engineering Evaluation & Public Notice Processing Time

BILLING DATE: 1/7/99

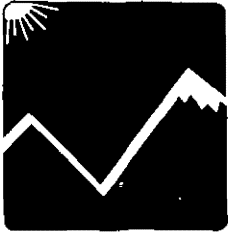
TOTAL FEES	\$ 999.00
LESS AMOUNT PAID	<u>\$ 650.00</u>
BALANCE DUE	\$ 349.00

THE ABOVE TOTAL IS BASED ON THE FOLLOWING ITEMIZED LISTING:

<u>PERMIT UNIT</u>	<u>FEE</u>	<u>DESCRIPTION</u>
ENGINEERING TIME (18 HRS X \$55.50/HR)	\$999.00	ENGINEERING EVALUATION & PUBLIC NOTICE PROCESSING TIME

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  
ATTENTION: Mr. Steven Roeder



San Joaquin Valley  
Unified Air Pollution Control District

January 7, 1999

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

**Re: Notice of Final Action - Emission Reduction Credits**  
**Project Number: 970158**

Dear Mr. Menebroker:

The Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Texaco Exploration and Production, Inc. for emission reductions resulting from permanent shutdown of 13 natural gas-fired internal combustion engines at Sections 19F, 31B, and 24 of Township 19S, Range 15E in Coalinga, CA.

Enclosed are copies of the ERC Certificates and of the notice of final action to be published approximately three days from the date of this letter.

All comments received following the District's preliminary decision on this project were considered.

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Sincerely,

Seyed Sadredin  
Director of Permit Services

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Enclosures

c: David Warner, Permit Services Manager  
David L. Crow

Executive Director/Air Pollution Control Officer

1999 Tuolumne Street, Suite 200, Fresno, CA 93721 (559) 497-1000 FAX (559) 233-2057

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Northern Region

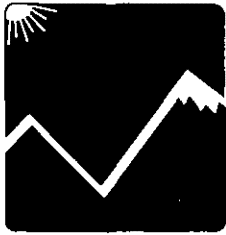
Central Region

Southern Region

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(805) 862-5200 FAX (805) 862-5201



San Joaquin Valley  
Unified Air Pollution Control District

January 7, 1999

Matt Haber, Chief  
Permits Office  
Air Division  
U.S. E.P.A. - Region IX  
75 Hawthorne Street  
San Francisco, CA 94105

**Re: Notice of Final Action - Emission Reduction Credits**  
**Project Number: 970158**

Dear Mr. Haber:

The Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Texaco Exploration and Production, Inc. for emission reductions resulting from permanent shutdown of 13 natural gas-fired internal combustion engines at Sections 19F, 31B, and 24 of Township 19S, Range 15E in Coalinga, CA.

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Director of Permit Services

SS:SR/cl  
Enclosures

c: David Warner, Permit Services Manager

David L. Crow  
Executive Director/Air Pollution Control Officer  
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(805) 862-5200 FAX (805) 862-5201

Fresno Bee

**NOTICE OF FINAL ACTION  
FOR THE ISSUANCE OF EMISSION REDUCTION CREDITS**

NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to Texaco Exploration and Production, Inc. for emission reductions resulting from permanent shutdown of 13 natural gas-fired internal combustion engines at Sections 19F, 31B, and 24 of Township 19S, Range 15E in Coalinga, CA.

All comments received following the District's preliminary decision on this project were considered.

The application review for Project #970158 is available for public inspection at the **SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 1999 TUOLUMNE STREET, SUITE 200, FRESNO, CA 93721.**



San Joaquin Valley  
Unified Air Pollution Control District  
Central Regional Office \* 1999 Tuolumne St., Suite 200 \* Fresno, CA 93721

## Emission Reduction Credit Certificate C-0251-1

ISSUED TO: Texaco Exploration and Production, Inc

ISSUED DATE: January 7, 1999

LOCATION OF REDUCTION: Township 19S Range 15E  
Coalinga, CA

For VOC Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
10,351 lbs	10,351 lbs	10,351 lbs	10,351 lbs

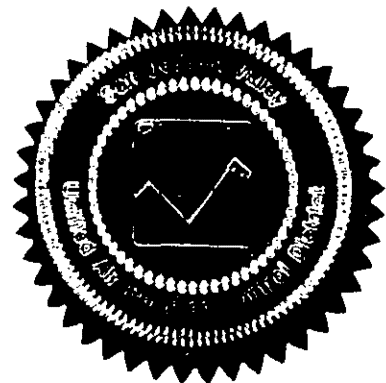
Conditions Attached

Method Of Reduction

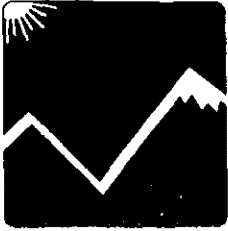
- Shutdown of Entire Stationary Source  
 Shutdown of Emissions Units  
 Other:

David L. Crow, APCO

  
Seyed Sadredin  
Director of Permit Services







San Joaquin Valley  
Unified Air Pollution Control District  
Central Regional Office \* 1999 Tuolumne St., Suite 200 \* Fresno, CA 93721

## Emission Reduction Credit Certificate C-0251-2

ISSUED TO: Texaco Exploration and Production, Inc

ISSUED DATE: January 7, 1999

LOCATION OF REDUCTION: Township 19S Range 15E  
Coalinga, CA

For NO<sub>x</sub> Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
2,977 lbs	2,977 lbs	2,977 lbs	2,977 lbs

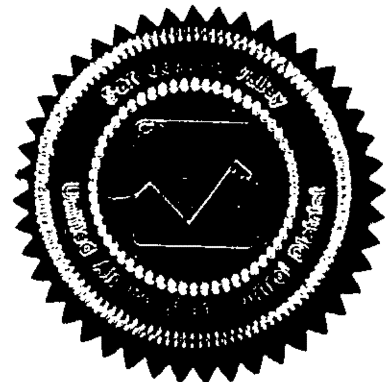
Conditions Attached

Method Of Reduction

- Shutdown of Entire Stationary Source  
 Shutdown of Emissions Units  
 Other:

David L. Crow, APCO

  
Seyed Sadredin  
Director of Permit Services





San Joaquin Valley  
Unified Air Pollution Control District  
Central Regional Office \* 1999 Tuolumne St., Suite 200 \* Fresno, CA 93721

## Emission Reduction Credit Certificate C-0251-3

ISSUED TO: Texaco Exploration and Production, Inc

ISSUED DATE: January 7, 1999

LOCATION OF REDUCTION: Township 19S Range 15E  
Coalinga, CA

For CO Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
15,709 lbs	15,709 lbs	15,709 lbs	15,709 lbs

Conditions Attached

Method Of Reduction

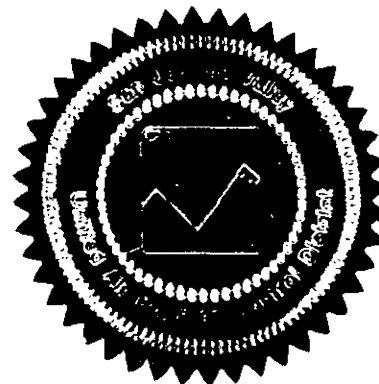
Shutdown of Entire Stationary Source

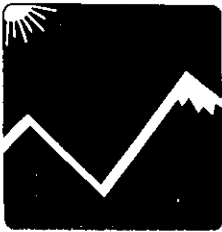
Shutdown of Emissions Units

Other:

David L. Crow, APCO

Seyed Sadredin  
Director of Permit Services





San Joaquin Valley  
Unified Air Pollution Control District

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

## Emission Reduction Credit Certificate C-0251-4

ISSUED TO: Texaco Exploration and Production, Inc

ISSUED DATE: January 7, 1999

LOCATION OF REDUCTION: Township 19S Range 15E  
Coalinga, CA

For PM10 Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
355 lbs	355 lbs	355 lbs	355 lbs

Conditions Attached

Method Of Reduction

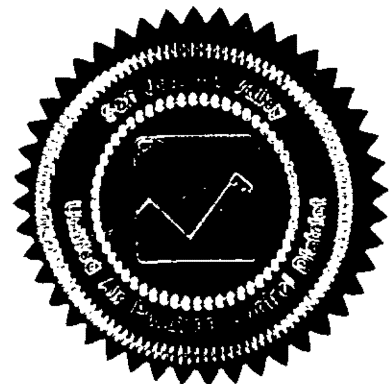
Shutdown of Entire Stationary Source

Shutdown of Emissions Units

Other:

David L. Crow, APCO

Seyed Saadredin  
Director of Permit Services





San Joaquin Valley  
Unified Air Pollution Control District  
Central Regional Office \* 1999 Tuolumne St., Suite 200 \* Fresno, CA 93721

## Emission Reduction Credit Certificate C-0251-5

ISSUED TO: Texaco Exploration and Production, Inc

ISSUED DATE: January 7, 1999

LOCATION OF REDUCTION: Township 19S Range 15E  
Coalinga, CA

For SOx Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
22 lbs	22 lbs	22 lbs	22 lbs

Conditions Attached

Method Of Reduction

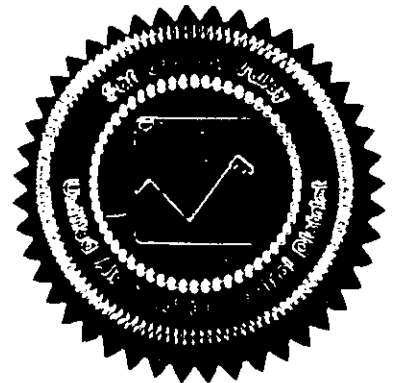
Shutdown of Entire Stationary Source

Shutdown of Emissions Units

Other:

David L. Crow, APCO

Seyed Sadredin  
Director of Permit Services



Steve R.

SJVUAPCD

ATTN FINANCE DEPARTMENT

1999 TUOLUMNE STREET #200

FRESNO , CA 93721

NOV 13 1998  
APR 11 1998

**PROOF OF PUBLICATION**

**COUNTY OF FRESNO  
STATE OF CALIFORNIA**

**EXHIBIT A.**

**PUBLIC NOTICE**

#46064

**NOTICE OF PRELIMINARY DECISION  
FOR THE PROPOSED ISSUANCE OF  
EMISSION REDUCTION CREDITS**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits (ERCs) to Texaco Exploration and Production, Inc. for the shutdown 13 natural gas-fired internal combustion engines located at Sections 7, 19F, 31B and 24 of Township 19s, Range 15E. The quantity of ERCs proposed for banking is: 88 lb-SQx, 11,908 lb-NOx, 62,836 lb-CO, 41,404 lb-VOC and 1,420 lb-PM per year.

The analysis of the regulatory basis for this proposed action, Project #970158, is available for public inspection at the District office at the address below. Written comments on this project must be submitted within 30 days of the publication date of this notice to **SEYED SADREDIN, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 1999 TUOLUMNE STREET, SUITE 200, FRESNO, CA 93721.**  
(November 10, 1998)

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.

Nov. 10, 1998

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.

Dated NOVEMBER 10, 1998

Cathy Aquilera



San Joaquin Valley  
Unified Air Pollution Control District

November 5, 1998

Mike Polyniak  
Texaco Exploration and Production, Inc.  
Star Route Box 42  
San Ardo, CA 93450

**Re: Notice of Preliminary Decision - Emission Reduction Credits**  
**Project Number: 970158**

Dear Mr. Polyniak:

Enclosed for your review and comment is the District's analysis of Texaco Exploration and Production, Inc.'s application for Emission Reduction Credits (ERCs) resulting from the shutdown of 13 natural gas-fired internal combustion engines located at Sections 7, 19F, 31B and 24 of Township 19s, Range 15E. The quantity of ERCs proposed for banking is: 88 lb-SO<sub>x</sub>, 11,908 lb-NO<sub>x</sub>, 62,836 lb-CO, 41,404 lb-VOC and 1,420 lb-PM<sub>10</sub> per year.

Also enclosed is the public notice of this decision 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.

If you have any questions regarding this matter, please contact Mr. Steven Roeder of Permit Services at (209) 497-1100.

Sincerely,

Seyed Sadredin  
Director of Permit Services

SS:SR/cl  
Enclosures  
c: David Warner, Permit Services Manager

David L. Crow

*Executive Director/ Air Pollution Control Officer*

1999 Tuolumne Street, Suite 200 Fresno, CA 93721 • (209) 497-1000 • FAX (209) 233-2057

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Unified Air Pollution Control District

November 5, 1998

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

**Re: Notice of Preliminary Decision - Emission Reduction Credits**  
**Project Number: 970158**

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Enclosures  
c: David Warner, Permit Services Manager

David L. Crow

*Executive Director/ Air Pollution Control Officer*

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**Northern Region**

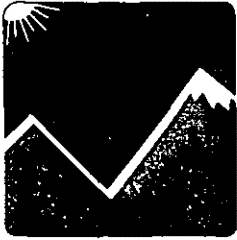
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San Joaquin Valley  
Unified Air Pollution Control District

November 5, 1998

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Permits Office  
Air Division  
U.S. E.P.A. - Region IX  
75 Hawthorne Street  
San Francisco, CA 94105

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Seyed Sadredin  
Director of Permit Services

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Enclosures  
c: David Warner, Permit Services Manager

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



Fresno Bee

**NOTICE OF PRELIMINARY DECISION  
FOR THE PROPOSED ISSUANCE OF  
EMISSION REDUCTION CREDITS**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits (ERCs) to Texaco Exploration and Production, Inc. for the shutdown 13 natural gas-fired internal combustion engines located at Sections 7, 19F, 31B and 24 of Township 19s, Range 15E. The quantity of ERCs proposed for banking is: 88 lb-SO<sub>x</sub>, 11,908 lb-NO<sub>x</sub>, 62,836 lb-CO, 41,404 lb-VOC and 1,420 lb-PM<sub>10</sub> per year.

The analysis of the regulatory basis for this proposed action, Project #970158, is available for public inspection at the District office at the address below. Written comments on this project must be submitted within 30 days of the publication date of this notice to **SEYED SADREDIN, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 1999 TUOLUMNE STREET, SUITE 200, FRESNO, CA 93721.**

# **ERC APPLICATION**

## **Final Evaluation**

Project Number: 970158

Processing Engineer: **Steve Roeder**

Lead Engineer: **Jovencio Refuerzo**

Date: **November 4, 1998**

Facility Name: **Texaco Exploration and Production, Inc.**  
Mailing Address: **Star Route Box 42**  
**San Ardo, CA 93450**

Contact Name: **Mike Polyniac**  
Telephone: **(805) 392-2299**

Date Received: **February 27, 1997**  
Deemed Complete: **March 5, 1998**

### **I. Summary**

The primary business of this facility is oilfield gas production. Texaco has submitted applications to bank CO, NO<sub>x</sub>, PM<sub>10</sub>, SO<sub>x</sub> and VOC emission reduction credits (ERC's) for the shutdown of thirteen natural gas-fired internal combustion (IC) engines. The facility surrendered their Permits to Operate (PTO's) with the original applications which were received by the District on February 27, 1997. Copies of the surrendered permits are included in Appendix A of this report.

The purpose of this report is to quantify the amount of emission reductions which can be banked.

### **II. Applicable Rules**

Rule 2201 New and Modified Stationary Source Review Rule (6/15/95)  
Rule 2301 Emission Reduction Credit Banking (12/17/92)  
Rule 4701 Stationary Internal Combustion Engines (December 19, 1996)

### **III. Location of Reduction**

The equipment was located at the following sites:

Section 7	Township 19S	Range 15E	Gas Production	Fresno County
Section 19F	Township 19S	Range 15E	Gas Production	Fresno County
Section 31B	Township 19S	Range 15E	Gas Production	Fresno County
Section 24	Township 19S	Range 15E	Gas Production	Fresno County

#### IV. Method of Generating Reductions

The facility was permitted to operate and ceased operations of thirteen gas-fired IC engines as follows:

Texaco Permit	Unocal Permit	Fresno County Permit	Quantity	Description
C-2885-15-0	C-1659-61-0	3040060107	1	300 hp natural gas fired I.C. engine, S/N 39508, ID #1, located at Whiskey HL Plant. The engine drives a gas compressor.
C-2885-17-0	C-1659-63-0	3040060112	5	1802 hp total natural gas fired I.C. engines at the 19F Plant.: (2) 500 hp (S/N 22616 & 22617); 600 hp (S/N A21062) for driving gas compressors; and (2) 101 hp for pump/fans.
C-2885-18-0	C-1659-64-0	3040060113	2	(2) 365 hp (ID #1 & 2) natural gas fired I.C. engines located at Site 31B driving gas compressors.
C-2885-22-0	C-1659-62-0	3040060111	1	300 hp natural gas fired I.C. engine (ID #1), Clark Model HMA-8, driving gas compressors.
C-2885-23-0	C-1659-62-0	3040060111	1	265 hp natural gas fired I.C. engine (ID #2), Clark Model HMA-6, driving gas compressors.
C-2885-24-0	C-1659-62-0	3040060111	1	225 hp natural gas fired I.C. engine (ID #3), Clark Model MA-6, driving gas compressors.
C-2885-25-0	C-1659-62-0	3040060111	1	225 hp natural gas fired I.C. engine (ID #4), Clark Model MA-6, driving gas compressors.
C-2885-26-0	C-1659-62-0	3040060111	1	225 hp natural gas fired I.C. engine (ID #5), Clark Model MA-36, driving gas compressors.

#### V. Calculations

##### A. Historical Actual Emissions (HAE)

In order to calculate Historical Actual Emissions, the historical emission factors will first be established, then the historical fuel use data will be presented. Finally, the HAE will be calculated.

##### 1. Assumptions

- Engines are lean-burn (per applicant for similar units listed in Compliance Plan for Rule 4701)
- Annual emissions will be rounded to the nearest pound in final calculations in accordance with District Policy NSR/ERC 8.
- hhv for natural gas = 1054 btu/scf (Per Applicant)

## 2. Emission Factors

Since there is no source test emissions data available for these engines, and since we were unable to locate actual source test data from similar engines, the actual emissions must be estimated as accurately as possible. There are two sources of emission factors which will be considered. The emission factors from each source will be compared and the lowest value for each pollutant will be selected for historical annual emission calculations.

### a. Emission Factors from Records of Fuel Use and Emission Data

Records of daily fuel consumption and daily emissions have been supplied to the District by Unocal Corporation in 1990 (see Appendix B). This supplied data was considered to be reasonable and was later used by the District to create the emission limits which appear on Permits to Operate C-2885-15, -17 and -18, which represent 7 of the 13 engines referenced in this project.

Average emission factors (in lb/MMscf) for SO<sub>x</sub>, NO<sub>x</sub>, CO and HC will be calculated from these figures by adding the total sum of each pollutant on a daily basis and then dividing by the total daily fuel use as presented in the following table:

<b>Emission Factors Derived from Facility Records</b>					
Unit	SO <sub>x</sub> (lb/day)	NO <sub>x</sub> (lb/day)	CO (lb/day)	VOC (lb/day)	Fuel Use scf/day
C-2885-15	0.23	306.9	38.8	126.4	69120
C-2885-17	0.38	511.5	64.7	210.6	115200
C-2885-17	0.38	511.5	64.7	210.6	115200
C-2885-17	0.46	613.8	77.6	210.6	138461
C-2885-17	0.08	103.3	13.1	42.5	23270
C-2885-17	0.08	103.3	13.1	42.5	23270
C-2885-18	0.2	269.8	34.1	111.1	70956
C-2885-22	0.2	269.8	34.1	111.1	70956
C-2885-23	0.16	219.6	27.8	90.4	54696
C-2885-24	0.17	230.2	29.1	94.8	51840
C-2885-25	0.17	230.2	29.1	94.8	51840
C-2885-26	0.17	230.2	29.1	94.8	51840
<b>TOTAL:</b>	<b>2.68</b>	<b>3600.1</b>	<b>455.3</b>	<b>1440.2</b>	<b>836649</b>
<b>Emission Factors</b>	<b>3.20 (lb/MMscf)</b>	<b>4303.00 (lb/MMscf)</b>	<b>544.19 (lb/MMscf)</b>	<b>1721.39 (lb/MMscf)</b>	

**b. Emission Factors from AP-42**

The following emission factors for NO<sub>x</sub>, CO and VOC are from AP-42 Table 3.2-1 *Criteria Emission Factors for Natural Gas Prime Movers* dated 10/96. Since this AP-42 table does not supply emission factors for SO<sub>x</sub> and PM<sub>10</sub>, the emission factors for SO<sub>x</sub> and PM<sub>10</sub> are taken from EPA publication 450-4-90-003 "Airs Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Pollutants," section - Natural Gas Commercial I.C. Engines.

Emission Factors from AP-42 and EPA 450-4-90-003			
SO <sub>x</sub>	0.6 (lb/MMscf)		
NO <sub>x</sub>	3.2 (lb/MMBtu) x	1054 (Btu/scf) =	3373 (lb/MMscf)
CO	0.42 (lb/MMBtu) x	1054 (Btu/scf) =	442.7 (lb/MMscf)
TOC	1.3 (lb/MMBtu) x	1054 (Btu/scf) =	1370 (lb/MMscf)
PM10	10 (lb/MMscf)		

**c. Comparison of Emission Factors for Historical Actual Emissions**

Since these engines have not been source tested to verify the accuracy of the emissions data supplied by Unocal, the emission factors derived from this data will be compared with the emission factors presented in AP-42. The lower emission factor for each pollutant shall be selected as the most accurate estimate of historical actual emission factors.

Historical Actual Emission Factors			
	Derived (lb/MMscf)	AP-42 (lb/MMscf)	Selected (lb/MMscf)
SO <sub>x</sub>	3.2	0.6	0.6
NO <sub>x</sub>	4303	3373	3373
CO	544.19	442.7	442.7
VOC	1721.39	1370	1370
PM10		10	10

In all cases, the emission factors from AP-42 are lower than the emission factors derived from the supplied emissions data. Therefore, the AP-42 emission factors have been selected as the most conservative estimate of actual emissions.

**3. Fuel Use Data**

Fuel use data must be based upon an acceptable baseline period. First, the shutdown date will be established, then the baseline period will be determined. Finally, fuel use data for the selected period will be presented.

**a. Baseline Period Determination**

**1. Shutdown Date**

Pursuant to Rule 2301 Section 3.11, the date of shutdown for permitted sources shall be the date of surrender of the operating permits or the cessation of emissions, whichever is earlier. Fuel usage records presented in Appendix C of this report indicate that these engines were last operated in 1993. However, since the engines were maintained in operable condition until the surrender of permits in 1997, and because of the variable nature of oilfield operations, the District expects that Texaco intended to operate the engines if needed. Therefore, the date permits were surrendered is considered the shut-down date, which is February 27, 1997.

**2. Baseline Period**

Pursuant to Rule 2201 Section 3.7, the baseline period consists of two years immediately preceding the date of reduction, or at least two consecutive years within five years prior to the ATC application, if they are more representative of "normal source operation".

As verified by the fuel use records supplied by the applicant (Appendix C), of the 5 years preceding the shutdown date, the engines were operated only in 1992 and 1993. Natural gas production has decreased significantly in the area over the years, which may have contributed to Texaco's decision to shut-down these engines. Fuel use data from 1989 show that the compressor engines were used at a higher rate in the past. Since there are no fuel usage records available for 1994-1996 because the engines did not operate during this time, 1992 and 1993 will be used to represent normal source operations and the baseline emissions.

**b. Fuel Use Data**

The fuel use data is from the actual fuel use records supplied in Appendix C of this report. Data for the two years presented will be averaged together in order to produce average annual emissions.

Historic Annual Average Fuel Use					
Permit	Hp	Unit	1992	1993	Average
			Actual Fuel Use (MMscf)	Actual Fuel Use (MMscf)	Actual Fuel Use (MMscf)
C-2885-15-0	300	Whiskey Hill	25.23	8.41	16.82
C-2885-17-0	1802	19F	151.62	50.52	101.07
C-2885-18-0	730	31-B-Plt	51.8	17.26	34.53
C-2885-22-0	300	Binkley #1	23.13	0	11.57
C-2885-23-0	265	Binkley #2	18.3	0	9.15
C-2885-24-0	225	Binkley #3	17.34	0	8.67
C-2885-25-0	225	Binkley #4	17.34	0	8.67
C-2885-26-0	225	Binkley #5	17.34	0	8.67
Total:			322.1	76.19	199.15

#### 4. Historical Actual Emissions (HAE)

Historical Actual Emissions are determined by multiplying the historical annual average fuel use (above) by the emission factors appearing in Section V.A.2.c:

Historical Actual Annual Emissions							
Emission Factors (lb/MMScf):		SOx	NOx	CO	VOC	PM10	
		0.6	3373	442.7	1370	10	
Unit	Average fuel use (MMscf/yr)	Historical Annual Emissions (pounds)					
		SOx	NOx	CO	VOC	PM10	
C-2885-15-0	16.82	10	56734	7446	23043	168	
C-2885-17-0	101.07	61	340909	44744	138466	1011	
C-2885-18-0	34.53	21	116470	15286	47306	345	
C-2885-22-0	11.57	7	39026	5122	15851	116	
C-2885-23-0	9.15	5	30863	4051	12536	92	
C-2885-24-0	8.67	5	29244	3838	11878	87	
C-2885-25-0	8.67	5	29244	3838	11878	87	
C-2885-26-0	8.67	5	29244	3838	11878	87	
Total:		199.15	119	671733	88164	272836	1992

#### B. Emissions Adjusted for Rule 4701

Pursuant to Rule 2201 Section 3.2.3, actual emission reductions are reductions beyond reductions attributed to control measures, a District Air Quality Plan, or other laws. Emission factors used for calculating emission reductions may not therefore exceed the emission factor limits for NO<sub>x</sub>, CO and VOC from Rule 4701 which are posted below. The emission factors from Rule 4701 will first be presented, and then compared to the historical emission factors. Finally, Emissions Adjusted for Rule 4701 will be calculated.

## 1. Assumptions

- Emission Factors for NO<sub>x</sub> and CO taken from Rule 4701 are from Section 5.1.3, Table 3, Section 3.b
- F-factor for natural gas combustion is 8740 dscf per MMBtu
- Molecular weight of NO<sub>x</sub> is 46 (gram/mole)
- Molecular weight of CO is 28 (gram/mole)
- Molecular weight of VOC, as methane [CH<sub>4</sub>] is 16 (gram/mole)
- Standard atmospheric pressure is 101,325 (Pa)
- Standard temperature is 288 (°K)

## 2. Emission Factors

The emission factors from Rule 4701 are given in *parts per million by volume* (ppmv) and will be converted into *pounds per million standard cubic feet of exhaust* (lb/MMscf) for the purpose of comparison with emission factors derived from permit conditions and for calculating annual emissions. The emission factors presented in Rule 4701 will then be compared to the emission factors used for calculating HAE and the more conservative figure shall be selected for calculating emission adjusted for Rule 4701.

### a. Emission Factors from Rule 4701

Emission Factors from Rule 4701	
Pollutant	Emission Factor
NO <sub>x</sub>	75 ppmv
CO	2000 ppmv
VOC	750 ppmv

Conversion from ppmv in the exhaust stream to lb of pollutant per MMscf of heat input for any gaseous pollutant can be calculated as follows:

$$\frac{\text{lb}}{\text{MMscf}_m} = \frac{F \frac{\text{dscf}}{\text{MMBtu}} \times H \frac{\text{Btu}}{\text{scf}} \times \frac{\text{ppm}}{1000000} \times 101325 \text{ Pa} \times MW \frac{\text{g}}{\text{mole}}}{35.32 \frac{\text{ft}^3}{\text{M}^3} \times 8.3145 \frac{\text{Pa} \cdot \text{M}^3}{\text{Mole} \cdot \text{K}} \times 288 \text{ K} \times 454 \frac{\text{g}}{\text{lb}}}$$

$$\frac{\text{lb}}{\text{MMscf}_m} = F \times H \times \text{ppmv} \times MW \times 2.639 \times 10^{-9}$$



where:

F = F factor of the fuel in (dscf/MMBtu)

H = higher heating value for the fuel used in (Btu/scf)

ppmv = emission factor in parts per million

MW = molecular weight of the pollutant in (gram/mole)

Emission Factors for NOx, CO and VOC Derived from Rule 4701					
Pollutant	F (dscf/MMBtu)	H (Btu/scf)	ppmv	MW (g/mole)	Emission Factor (lb/MMscf)
NOx	8740	1054	75	46	83.9
CO	8740	1054	2000	28	1361.4
VOC	8740	1054	750	16	291.7

### b. Comparison and Selection of Emission Factors

The the emission factors from Rule 4701 (above) will be compared with the historical actual emission factors, and the more conservative figure shall be selected for calculating emission adjusted for Rule 4701.

Selected Emission Factors			
Pollutant	Rule 4701 Emission Factors (lb/MMscf)	Historical Actual Emission Factors (lb/MMscf)	Final Emission Factors (lb/MMscf)
NOx	83.9	3373	83.9
CO	1361.4	442.7	442.7
VOC	291.7	1370	291.7

### 3. Annual Emissions Adjusted for Rule 4701

The annual emissions adjusted for Rule 4701 are calculated as follows:

Historical Annual Emissions Adjusted for Rule 4701						
Emission Factors (lb/MMScf):		SOx	NOx	CO	VOC	PM10
		0.6	83.9	442.7	291.7	10
Unit	Average fuel use (MMscf/yr)	Adjusted Annual Emissions (pounds)				
		SOx	NOx	CO	VOC	PM10
C-2885-15-0	16.82	10	1411	7446	4906	168
C-2885-17-0	101.07	61	8480	44744	29482	1011
C-2885-18-0	34.53	21	2897	15286	10072	345
C-2885-22-0	11.57	7	971	5122	3375	116
C-2885-23-0	9.15	5	768	4051	2669	92
C-2885-24-0	8.67	5	727	3838	2529	87
C-2885-25-0	8.67	5	727	3838	2529	87
C-2885-26-0	8.67	5	727	3838	2529	87
<b>Total:</b>	<b>199.15</b>	<b>119</b>	<b>16709</b>	<b>88164</b>	<b>58092</b>	<b>1992</b>

## **C. Emissions Adjusted for Fuel Use Limits**

Pursuant to Rule 2201 Section 6.2.1.4, Actual Emissions may not exceed the emissions associated with the maximum allowable fuel consumption posted on the Permits to Operate. First, adjustments to the annual duty cycle will be made, then adjustments in the annual fuel consumption will be made. The adjusted fuel consumption for the two years presented will then be averaged together and finally, emissions adjusted for fuel use limits will be calculated.

### **1. Adjustment for Annual Duty Cycle**

Fuel use records from 1992 (Appendix C) indicate that these engines are capable of, and have burning much more fuel than the permitted amount. Pursuant to Rule 2201 Section 6.2.1.4, actual emissions may not exceed the maximum permitted emissions described in the permit conditions. This means that the amount of actual emissions may not exceed the amount of emissions associated with the burning of the maximum permitted fuel use on a daily basis.

For example, these engines could have burned up the amount of fuel posted in the 1992 annual fuel register in less than 365 days and then remained shut down for the rest of the days in that year. If this were the case, then Actual Emissions would have to be adjusted to only reflect emissions created during the number of the days per year that the equipment operated.

Since daily fuel use records are not available, the District must determine whether or not the engines were operated on a daily basis. Two factors are immediately considered. First, gas production seems to be consistent. Gas production records for the Coalinga Nose Unit (Appendix D) indicate that there was substantial gas production with the exception of only two days during the period from May 1, 1996 to March 25, 1998. This supports the idea that the engines have been operated on a regular basis.

The second consideration is the immense amount of fuel consumed in 1992. Based on the fuel records for that year (Appendix C), units C-2885-15-0, C-2885-17-0 and C-2885-18-0 consumed a total of 228.65 MMscf of natural gas, which is considerably above their calculated annual maximum allowed fuel consumption (calculated above) of 145.74 MMscf.

These two factors combine to indicate that these engines were indeed fired a lot. Since there is no indication otherwise, we will accept that these engines were fired every day.

Therefore, no adjustment is required for the annual duty cycle.

## 2. Adjustment for Maximum Permitted Fuel Use

The following permit units have permit conditions which limit the maximum consumption of natural gas on a daily basis.

Permit	Fuel Use [scf/day]
C-2885-15-0	42,300
C-2885-17-0	254,000
C-2885-18-0	103,000

Emission reductions, however, are determined on an annual basis. Since daily fuel use records are not available, and there is no adjustment necessary for the annual duty cycle (above), the maximum allowed annual fuel use may be obtained by multiplying the daily use by 365 as follows:

Maximum Allowable Annual Fuel Usage					
C-2885-15-0	42300	(scf/day) x	365	(day/year) =	<b>15.44 (MMscf/year)</b>
C-2885-17-0	254000	(scf/day) x	365	(day/year) =	<b>92.71 (MMscf/year)</b>
C-2885-18-0	103000	(scf/day) x	365	(day/year) =	<b>37.60 (MMscf/year)</b>

The maximum allowable annual fuel usage posted above will be compared to the historical annual fuel use for 1992 and 1993. The more conservative figure for each permit unit will be selected for determining average adjusted annual fuel use.

Adjusted Annual Fuel Use for 1992			
Unit	Max Allowed Fuel Use (MMscf/year)	Actual Annual Fuel Use (MMscf/year)	Adjusted Annual Fuel Use (MMscf/year)
C-2885-15-0	15.44	25.23	<b>15.44</b>
C-2885-17-0	92.71	151.62	<b>92.71</b>
C-2885-18-0	37.60	51.80	<b>37.60</b>

Adjusted Annual Fuel Use for 1993			
Unit	Max Allowed Fuel Use (MMscf/year)	Actual Annual Fuel Use (MMscf/year)	Adjusted Annual Fuel Use (MMscf/year)
C-2885-15-0	15.44	8.41	<b>8.41</b>
C-2885-17-0	92.71	50.52	<b>50.52</b>
C-2885-18-0	37.60	17.26	<b>17.26</b>

The adjusted annual fuel use values are averaged together in the following table:

Annual Average Adjusted Fuel Use					
Permit	Hp	Unit	1992	1993	Average
			Adjusted Fuel Use (MMscf)	Adjusted Fuel Use (MMscf)	Adjusted Fuel Use (MMscf)
C-2885-15-0	300	Whiskey Hill	15.44	8.41	11.93
C-2885-17-0	1802	19F	92.71	50.52	71.62
C-2885-18-0	730	31-B-Plt	37.6	17.26	27.43
C-2885-22-0	300	Binkley #1	23.13	0	11.57
C-2885-23-0	265	Binkley #2	18.3	0	9.15
C-2885-24-0	225	Binkley #3	17.34	0	8.67
C-2885-25-0	225	Binkley #4	17.34	0	8.67
C-2885-26-0	225	Binkley #5	17.34	0	8.67
<b>Total:</b>			<b>239.2</b>	<b>76.19</b>	<b>157.70</b>

### 3. Annual Emissions Adjusted for Fuel Use Limits

The annual emissions adjusted for fuel use limits are obtained by multiplying the selected emission factors adjusted for Rule 4701 by the adjusted fuel use data presented above. The results are posted in the following table:

Historical Annual Emissions Adjusted for Maximum Permitted Fuel Use						
Emission Factors (lb/MMScf):	SOx	NOx	CO	VOC	PM10	
	0.6	83.9	442.7	291.7	10	
Unit	Average fuel use (MMscf/yr)	Adjusted Annual Emissions (pounds)				
		SOx	NOx	CO	VOC	PM10
C-2885-15-0	11.93	7	1001	5281	3480	119
C-2885-17-0	71.62	43	6009	31706	20892	716
C-2885-18-0	27.43	16	2301	12143	8001	274
C-2885-22-0	11.57	7	971	5122	3375	116
C-2885-23-0	9.15	5	768	4051	2669	92
C-2885-24-0	8.67	5	727	3838	2529	87
C-2885-25-0	8.67	5	727	3838	2529	87
C-2885-26-0	8.67	5	727	3838	2529	87
<b>Total:</b>	<b>157.71</b>	<b>95</b>	<b>13232</b>	<b>69818</b>	<b>46004</b>	<b>1577</b>

### D. Further Adjustments to HAE

Pursuant to Section 6.2.1 of Rule 2201, HAE must be discounted for any emissions reductions proposed in the District Air Quality Plan for attaining the annual reductions required by the California Clean Air Act. There are no further adjustments required beyond the adjustments for Rule 4701 emission factors and fuel use limits posted above.

**E. Actual Emissions Reductions (AER)**

Per Rule 2201, Section 6.5.2, the Actual Emissions Reductions due to shutdown of an emissions unit is equal to the Adjusted Annual Emissions presented in Section V.C.3 above.

Actual Emission Reductions				
SOx 95 lb/year	NOx 13232 lb/year	CO 69818 lb/year	VOC 46004 lb/year	PM10 1577 lb/year

**F. Air Quality Improvement Deduction (AQID)**

Pursuant to Rule 2201 Section 6.5, the amount of emission reductions which may be banked due to equipment shutdown must be adjusted by a 10% Air Quality Improvement Deduction. The remaining bankable emission reductions are calculated in the Table in Section H below.

**G. Increases in Permitted Emissions (IPE)**

There is no IPE associated with this project.

**H. Bankable Emissions Reductions Credits**

The bankable Emission Reduction Credits for this shutdown are calculated in the table below using the formula:  $ERC = AER - AQID$ . The ERC values are rounded to the nearest whole pound. The quarterly values are then determined by dividing the bankable values evenly into quarters and rounded to the nearest pound. The bankable annual total for each pollutant is posted for completeness.

Bankable Emission Reduction Credits							
	HAE		AQID		ERC		
SOx	95	-	9.5	=	86		
NOx	13232	-	1323.2	=	11909		
CO	69818	-	6981.8	=	62836		
VOC	46004	-	4600.4	=	41404		
PM10	1577	-	157.7	=	1419		
	<b>Quarter 1</b>		<b>Quarter 2</b>		<b>Quarter 3</b>	<b>Quarter 4</b>	<b>Total</b>
SOx	22		22		22	22	88
NOx	2977		2977		2977	2977	11908
CO	15709		15709		15709	15709	62836
VOC	10351		10351		10351	10351	41404
PM10	355		355		355	355	1420

## **VI. Compliance**

Pursuant to Rule 2201 Section 3.2.1, Actual Emissions Reductions the reductions must be:

### **A. Real**

The emissions reductions are generated by the shutdown of the processing equipment. The emissions reductions are calculated from actual historic fuel usage data and approved emission factors. Therefore, the reductions are real.

### **B. Enforceable**

The Permits to Operate the engines have been surrendered. The equipment cannot be legally operated without a valid PTO. Therefore, the reductions are enforceable.

### **C. Quantifiable**

Reduction amounts are calculated based on historic fuel usage data and approved emission factors. Therefore, the reductions are quantifiable.

### **D. Permanent**

The equipment has been shutdown and the PTO's surrendered. Further operation requires prior District approval by filing an application. Therefore, the reductions are permanent.

### **E. Surplus**

Texaco voluntarily shutdown their engines. The shut down was not required by any law, rule, agreement, regulation, nor attributed to a control measure noticed for workshop or contained in the District Air Quality Attainment Plan. However, as shown in Sections V.A. and V.B of this report, these engines are subject to the requirements of Rule 4701 and permit conditions for emission factors and fuel use. Only the emissions which are allowed by Rule 4701 and the permit conditions on the Permits to Operate are considered to be surplus actual emissions.

The bankable emissions reductions posted in Section V.H above have been corrected for Rule 4701 and permit conditions and are therefore considered to be surplus emissions.

### **F. Not used for the approval of an Authority to Construct or as Offsets**

The emission reduction credits generated by the shutdown of the test operation have not been used for the approval of any Authority to Construct or as offsets.

**G. Timely submittal**

The permits for the engines were surrendered on February 17, 1997, which is the shut-down date of the equipment. The ERC application was submitted March 3, 1997. Therefore, the application was submitted in a timely fashion, within 180 days of the shutdown, in compliance with Sections 4.2.3 and 5.5 of Rule 2301.

**VII. Recommendation**

Issue Emission Reduction Credit as presented in the following table:

Emission Reduction Credits					
Pollutant	Quarter 1 (lb)	Quarter 2 (lb)	Quarter 3 (lb)	Quarter 4 (lb)	TOTAL (lb)
SOx	22	22	22	22	88
NOx	2977	2977	2977	2977	11908
CO	15709	15709	15709	15709	62836
VOC	10351	10351	10351	10351	41404
PM10	355	355	355	355	1420

## **Appendix A: Former Permits to Operate**





San Joaquin Valley  
Unified Air Pollution Control District

**PERMIT TO OPERATE**

PERMIT NO: C-2885-17-0

EXPIRATION DATE: 10/31/1997

LEGAL OWNER OR OPERATOR: TEXACO EXPLORATION & PROD  
MAILING ADDRESS: STAR ROUTE BOX 42  
SAN ARDO, CA 93450

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

**EQUIPMENT DESCRIPTION:**

1802 HP NATURAL GAS FIRED IC ENGINES AT THE 19F PLANT. 2-500 HP(SN 22616 AND 22617) & 600 HP(SN A21062) FOR DRIVING GAS COMPRESSORS; AND 2-101 HP FOR PUMP/ FANS.

**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. Equipment may only be fueled by natural gas.
4. Combined natural gas consumption rate shall not exceed 254,000 scf per day.
5. Emissions shall not exceed 830 lb NOx/day, 107 lb CO day, nor 336 lb VOC/day.
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.

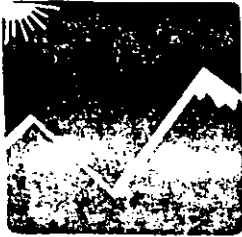
*92 - 22. ... used → ...*  
*OK*

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

Central Regional Office \* 1999 Tuolumne, Suite 200 \* Fresno, California 93721 \* (209)497-1000 \* FAX (209) 233-2203



San Joaquin Valley  
Unified Air Pollution Control District

## PERMIT TO OPERATE

PERMIT NO: C-2885-18-0

EXPIRATION DATE: 10/31/1997

LEGAL OWNER OR OPERATOR: TEXACO EXPLORATION & PROD  
MAILING ADDRESS: STAR ROUTE BOX 42  
SAN ARDO, CA 93450

LOCATION: GAS PRODUCTION, FRESNO COUNTY SECTION 31B TOWNSHIP 19S RANGE 15E

EQUIPMENT DESCRIPTION:  
730 HP NATURAL GAS FIRED IC ENGINES LOCATED AT SITE 31B. 2-365 HP(ID #1 & #2) DRIVING GAS COMPRESSORS.

### 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 103,000 scf per day.
4. Equipment may only be fueled by natural gas.
5. Emissions shall not exceed 336 lb NOx/day, 44 lb CO day, nor 136 lb VOC/day.
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.

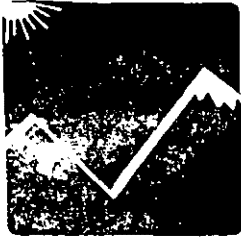
This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon 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

Central Regional Office • 1999 Tuolumne, Suite 200 \* Fresno, California 93721 \* (209)497-1000 \* FAX (209) 233-2203

1986.7.12 NAKAUS



San Joaquin Valley  
Unified Air Pollution Control District

**PERMIT TO OPERATE**

PERMIT NO: C-2885-22-0

EXPIRATION DATE: 10/31/1997

LEGAL OWNER OR OPERATOR: TEXACO EXPLORATION & PROD  
MAILING ADDRESS: STAR ROUTE BOX 42  
SAN ARDO, CA 93450

LOCATION: GAS PRODUCTION, FRESNO COUNTY SECTION 24 TOWNSHIP 19S RANGE 15E

EQUIPMENT DESCRIPTION:  
300 HP NATURAL GAS FIRED IC ENGINE (ID #1), CLARK MODEL HMA-8, DRIVING GAS COMPRESSORS.

**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. No air contaminant shall be released into the atmosphere which causes a public nuisance.
4. 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.
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.
6. The engine shall be fired on natural gas only.
7. Emissions from the engine shall not exceed 172.8 lb NOx/day, 23.8 lb CO/day, 6.8 lb VOC/day, nor 4.0 lb PM-10/day.

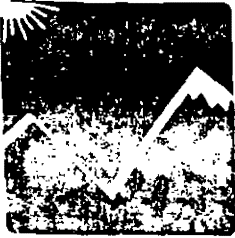
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DAVID L. CROW

Executive Director/APCO

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1999.02 SAKAUS



San Joaquin Valley  
Unified Air Pollution Control District

## PERMIT TO OPERATE

PERMIT NO: C-2885-23-0

EXPIRATION DATE: 10/31/1997

LEGAL OWNER OR OPERATOR: TEXACO EXPLORATION & PROD  
MAILING ADDRESS: STAR ROUTE BOX 42  
SAN ARDO, CA 93450

LOCATION: GAS PRODUCTION, FRESNO COUNTY SECTION 24 TOWNSHIP 19S RANGE 15E

**EQUIPMENT DESCRIPTION:**

265 HP NATURAL GAS FIRED IC ENGINE (ID #2), CLARK, MODEL HMA-6, DRIVING GAS COMPRESSORS.

## 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. No air contaminant shall be released into the atmosphere which causes a public nuisance.
4. 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.
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.
6. The engine shall be fired on natural gas only.
7. Emissions from the engine shall not exceed 152.6 lb NO<sub>x</sub>/day, 21.0 lb CO/day, 6.0 lb VOC/day, nor 3.5 lb PM-10/day.

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

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1990.02 SAKA/VA



San Joaquin Valley  
Unified Air Pollution Control District

## PERMIT TO OPERATE

PERMIT NO: C-2885-24-0

EXPIRATION DATE: 10/31/1997

LEGAL OWNER OR OPERATOR: TEXACO EXPLORATION & PROD  
MAILING ADDRESS: STAR ROUTE BOX 42  
SAN ARDO, CA 93450

LOCATION: GAS PRODUCTION, FRESNO COUNTY SECTION 24 TOWNSHIP 19S RANGE 15E

EQUIPMENT DESCRIPTION:  
225 HP NATURAL GAS FIRED IC ENGINE (ID #3), CLARK, MODEL MA-6, DRIVING GAS COMPRESSORS.

## 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. No air contaminant shall be released into the atmosphere which causes a public nuisance.
4. 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.
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.
6. The engine shall be fired on natural gas only.
7. Emissions from the engine shall not exceed 129.6 lb NO<sub>x</sub>/day, 17.8 lb CO/day, 5.1 lb VOC/day, nor 3.0 lb PM-10/day.

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

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1996-11 NARA05



San Joaquin Valley  
Unified Air Pollution Control District

## PERMIT TO OPERATE

PERMIT NO: C-2885-25-0

EXPIRATION DATE: 10/31/1997

LEGAL OWNER OR OPERATOR: TEXACO EXPLORATION & PROD  
MAILING ADDRESS: STAR ROUTE BOX 42  
SAN ARDO, CA 93450

LOCATION: GAS PRODUCTION, FRESNO COUNTY SECTION 24 TOWNSHIP 19S RANGE 15E

EQUIPMENT DESCRIPTION:  
225 HP NATURAL GAS FIRED IC ENGINE (ID #4), CLARK, MODEL MA-6, DRIVING GAS COMPRESSORS.

### 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. No air contaminant shall be released into the atmosphere which causes a public nuisance.
4. 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.
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.
6. The engine shall be fired on natural gas only.
7. Emissions from the engine shall not exceed 129.6 lb NO<sub>x</sub>/day, 17.8 lb CO/day, 5.1 lb VOC/day, nor 3.0 lb PM-10/day.

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.

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San Joaquin Valley  
Unified Air Pollution Control District

**PERMIT TO OPERATE**

**PERMIT NO:** C-2885-26-0

**EXPIRATION DATE:** 10/31/1997

**LEGAL OWNER OR OPERATOR:** TEXACO EXPLORATION & PROD  
**MAILING ADDRESS:** STAR ROUTE BOX 42  
SAN ARDO, CA 93450

**LOCATION:** GAS PRODUCTION, FRESNO COUNTY SECTION 24 TOWNSHIP 19S RANGE 15E

**EQUIPMENT DESCRIPTION:**  
225 HP NATURAL GAS FIRED IC ENGINE (ID #5), CLARK, MODEL MA-36, DRIVING GAS COMPRESSORS.

**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. No air contaminant shall be released into the atmosphere which causes a public nuisance.
4. 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.
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.
6. The engine shall be fired on natural gas only.
7. Emissions from the engine shall not exceed 129.6 lb NOx/day, 17.8 lb CO/day, 5.1 lb VOC/day, nor 3.0 lb PM-10/day.

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

Central Regional Office \* 1999 Tuolumne, Suite 200 \* Fresno, California 93721 \* (209)497-1000 \* FAX (209) 233-2203

1998.12 NAKAUS



San Joaquin Valley  
Unified Air Pollution Control District

## PERMIT TO OPERATE

PERMIT NO: C-2885-15-0

EXPIRATION DATE: 10/31/1997

LEGAL OWNER OR OPERATOR: TEXACO EXPLORATION & PROD  
MAILING ADDRESS: STAR ROUTE BOX 42  
SAN ARDO, CA 93450

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

### EQUIPMENT DESCRIPTION:

300 HP NATURAL GAS FIRED I.C. ENGINE, SN 39508, ID #1, LOCATED AT WHISKY HL PLANT. THE ENGINE DRIVES A 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 42,300 scf per day.
4. Equipment may only be fueled by natural gas.
5. Emissions shall not exceed 138 lb NO<sub>x</sub>/day, 18 lb CO day, nor 56 lb VOC/day.
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

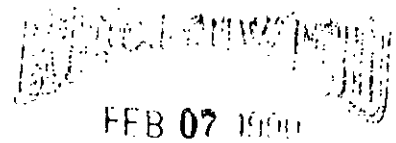
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## **Appendix B: Emissions Data from Unocal**

Unocal Oil & Gas Divisi  
Unocal Corporation  
P.O. Box 1074  
Coalinga, California 93210

**UNOCAL** 76



ENVIRONMENTAL HEALTH SYSTEM  
DEPARTMENT OF HEALTH

February 6, 1990

Mr. Dale Chapman  
County of Fresno  
Air Pollution Control District  
1221 Fulton Mall  
P.O. Box 11867  
Fresno, CA 93775

Dear Mr. Chapman:

As per our conversation on February 5, 1990, in regards to the Permits to Operate numbers 3040060104 thru 3040060162, I am supplying the attached information. Also as discussed, the fuel gas that feeds these engines is not measured by meters in all cases. All the engines located on Sections 13, 24, 6, 7, 18, and 19 are metered from one common gas meter. The engines located on Sections 20, 34, and 1 are not metered. All Scf/Day usage is the same for the years 1987, 1988, and 1989.

If you have any further questions, please feel free to call.

Sincerely,

George N. Folks Jr.  
Environmental Specialist

GNF/ksg

NATL.GAS FIRED  
COMPRESSORS



#	EQUIP. LOCATION	EQUIP. MANUFACTURER	SERIAL NUMBER	EQUIP. TYPE	HP RATING	FUEL	NOX (LB/DAY)	CO (LB/DAY)	HC (LB/DAY)	SO2 (LB/DAY)	PM (LB/DAY)	NATL/GAS (SCF/DAY)
						CONSUMP. (BTU/HP-HR)						
1	7-F PLT.	CLARK	20137	RA-3	300	10000	306.9	38.8	126.4	0.23	NA	61,920
1A	7-F PLT.	INGERSOLL	8EV948	XVG-8	300	9000	248.6	31.4	102.4	0.19	NA	61,920
2	7-F PLT.	CLARK	22253	RA-3	300	10000	306.9	38.8	126.4	0.23	NA	61,920
3	7-F PLT.	CLARK	22286	RA-3	300	10000	306.9	38.8	126.4	0.23	NA	61,920
4	7-F PLT.	CLARK	22345	RA-3	300	10000	306.9	38.8	126.4	0.23	NA	61,920
5	7-F PLT.	CLARK	A21152	RA-6	600	10000	613.8	77.6	252.7	0.46	NA	138,461
6	7-F PLT.	CLARK	A21174	RA-6	600	10000	613.8	77.6	252.7	0.46	NA	138,461
7	7-F PLT.	CLARK	A21264	HRA-6	660	9000	546.9	69.2	225.2	0.41	NA	136,224
8	7-F PLT.	CLARK	A2265	HRA-6	660	9000	546.9	69.2	225.2	0.41	NA	136,224
9	7-F PLT.	CLARK	A21266	HRA-6	660	9000	546.9	69.2	225.2	0.41	NA	136,224
10	7-F PLT.	CLARK	22627	RA-5	500	10000	511.5	64.7	210.6	0.38	NA	115,200
11	7-F PLT.	CLARK	22606	RA-5	500	10000	511.5	64.7	210.6	0.38	NA	115,200
12	7-F PLT.	CLARK	A25624	HRA-8	880	9000	729.1	92.2	300.2	0.54	NA	181,632
13	7-F PLT.	CLARK	A25625	HRA-8	880	9000	729.1	92.2	300.2	0.54	NA	181,632
14	7-F PLT.	CLARK	A25623	HRA-8	880	9000	729.1	92.2	300.2	0.54	NA	181,632
1	31B PLT.	COOPER	43259	GMX-6	365	8500	269.8	34.1	111.1	0.20	NA	70,956
2	31B PLT.	COOPER	42922	GMX-6	365	8500	269.8	34.1	111.1	0.20	NA	70,956
1	18F PLT.	CLARK	A21486	RA-6	600	10000	613.8	77.6	252.7	0.46	NA	138,461
2	18F PLT.	CLARK	A21487	RA-6	600	10000	613.8	77.6	252.7	0.46	NA	138,461
3	18F PLT.	CLARK	A21123	HRA-6	660	9000	546.9	69.2	225.2	0.41	NA	136,224
1	19F PLT.	CLARK	22616	RA-5	500	10000	511.5	64.7	210.6	0.38	NA	115,200
2	19F PLT.	CLARK	22617	RA-5	500	10000	511.5	64.7	210.6	0.38	NA	115,200
3	19F PLT.	CLARK	A21062	RA-6	600	10000	613.8	77.6	252.7	0.46	NA	138,461
1	2-7F PLT.	CLARK	21345	HRA-6	660	9000	546.9	69.2	225.2	0.41	NA	136,224
2	2-7F PLT.	CLARK	21352	RA-6	600	10000	613.8	77.6	252.7	0.46	NA	138,461
3	2-7F PLT.	CLARK	21346	RA-6	600	10000	613.8	77.6	252.7	0.46	NA	138,461
4	2-7F PLT.	COOPER	42683	GMX-6	365	8500	269.8	34.1	111.1	0.20	NA	70,956
1	BINK PLT.	CLARK	39540	MA-8	300	10000	306.9	38.8	126.4	0.23	NA	69,120
2	BINK PLT.	CLARK	50503	HMA-6	265	9000	219.6	27.8	90.4	0.16	NA	54,696
3	BINK PLT.	CLARK	38537	MA-6	225	10000	230.2	29.1	94.8	0.17	NA	51,840
4	BINK PLT.	CLARK	38509	MA-6	225	10000	230.2	29.1	94.8	0.17	NA	51,840
5	BINK PLT.	CLARK	38510	MA-6	225	10000	230.2	29.1	94.8	0.17	NA	51,840
1	WHISKY HI	CLARK	39508	MA-8	300	10000	306.9	38.8	126.4	0.23	NA	69,120



NATL. GAS FIRED  
SUPPORT EQUIP.

#	EQUIP. NAME	EQUIP. MANUFACTURE	SERIAL NUMBER	EQUIP. TYPE	RATED HP	FUEL					PM (LB/DAY)	NATL/GAS (SCF/DAY)
						CONSUMP. (BTU/HP-HR)	NOX (LB/DAY)	CO (LB/DAY)	HC (LB/DAY)	SO2 (LB/DAY)		
17	7-F FF	FORD	00512G-6T	FRD-6	101	10000	103.3	13.1	42.5	0.08	NA	23,270
19F	FAN	FORD	19250R19T	FRD-6	101	10000	103.3	13.1	42.5	0.08	NA	23,270
19F	TW-1	FORD	00250G09T	FRD-6	101	10000	103.3	13.1	42.5	0.08	NA	23,270
2-7	JKT/WTR	MOLINE	31002905	MM-504	104	8800	82.4	10.4	33.9	0.06	NA	21,120
2-7	F/FAN	MOLINE	31002895	MM-504	104	8800	82.4	10.4	33.9	0.06	NA	21,120
18F	FIN FAN	MOLINE	31002911	MM-504	104	8800	82.4	10.4	33.9	0.06	NA	21,120
18F	TW-1	MOLINE	31002893	MM-504	104	8800	82.4	10.4	33.9	0.06	NA	21,120
1	BINK SHIP	WAUKESHA	843635	145GK	130	9300	115.0	14.5	47.4	0.09	NA	27,900
1	7F W.WELL	WAUKESHA	689200	CWAJ	190	8700	147.1	18.6	60.6	0.11	NA	38,146
1	7F W-BST	WAUKESHA	71580	145GK	130	9300	115.0	14.5	47.4	0.09	NA	27,900
2	7F W-BST	WAUKESHA	80140	145GK	130	9300	115.0	14.5	47.4	0.09	NA	27,900
1	6F SUMP	WAUKESHA	515303	140GK	68	10500	76.7	9.7	31.6	0.06	NA	16,476
1	7-F FIRE	WAUKESHA	1075905	145GK	130	9300	115.0	14.5	47.4	0.09	NA	27,900
1	PV SHPG	WAUKESHA	879538	145GK	130	9300	115.0	14.5	47.4	0.09	NA	27,900
1	PV 64-20	MOLINE	31002898	MM-504	130	9300	115.0	14.5	47.4	0.09	NA	21,120
2	PV 86-20	WAUKESHA	879679	145GK	130	9300	115.0	14.5	47.4	0.09	NA	27,900
1	34F-55	WAUKESHA	970477	145GK	130	9300	115.0	14.5	47.4	0.09	NA	27,900
1	POLV 28X	WAUKESHA	910475	145GK	130	9300	115.0	14.5	47.4	0.09	NA	27,900
2	POLV 571	WAUKESHA	970476	145GK	130	9300	115.0	14.5	47.4	0.09	NA	27,900
3	POLV 55-1H	MOLINE	31002813	MM-504	130	9300	115.0	14.5	47.4	0.09	NA	21,120
1	CRYO TW	WAUKESHA	820613	145GK	130	9300	115.0	14.5	47.4	0.09	NA	27,900
2	CRYO TW	WAUKESHA	1062114	145GK	130	9300	115.0	14.5	47.4	0.09	NA	27,900
1	CRYO FD H2O	FORD	1211K02TF	FRD-6	101	10000	103.3	13.1	42.5	0.08	NA	23,270
1	34-F SHPG	WAUKESHA	910578	145GK	130	9300	115.0	14.5	47.4	0.09	NA	27,900
2	34-F SHPG	WAUKESHA	890292	140GK	130	9300	115.0	14.5	47.4	0.09	NA	27,900
1	34-F KOBE	WAUKESHA	960108	140GK	130	9300	115.0	14.5	47.4	0.09	NA	27,900
8	7-F FF	FORD	02721b271f	FRD-6	101	10000	103.3	13.1	42.5	0.08	NA	23,270

2049

## **Appendix C: Fuel Use Records**



CALENDAR YEAR 1992 EMISSIONS																
COMPANY NAME		UNOCAL OIL & GAS CENTRAL CALIFORNIA														
ADDRESS		CALAVERAS AVE.														
CITY, STATE, ZIP		P.O. BOX 1074 COALINGA, CA 93210														
NAME/TITLE OF RESPONSIBLE OFFICIAL		GEORGE N. FOLKS JR.														
PHONE NUMBER		(209) 935-0771														
DEV ID	APCD PERMIT #	SECTION/ TOV/NSHIP/ RANGE	H.P. RATING	EQUIP. TYPE	FUEL USE	FUEL UNITS	PROCESS GAS HEAT CONT./PPM(S)	CONTROL DEVICE(S)	USE EMISSION FACTORS IN LB/MMCF OR LB/1000 GAL FOR FUEL BURNING DEVICES					TONS/YEAR (TPY) = ((EF x FUEL USE)/20)		
									PM EF	CO EF	SOX EF	NOX EF	TOG EF	PM TPY	CO TPY	SOX TPY
7F PLT #12	3040060101*	7, 19S, 15E	880	GIC	66.30	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.3	14.3	0.0
7F PLT #13	3040060102*	7, 19S, 15E	880	GIC	66.30	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.3	14.3	#VALUE!
7F PLT #14	3040060103*	7, 19S, 15E	880	GIC	66.30	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.3	14.3	0.0
7F PLT #1	3040060104*	7, 19S, 15E	300	GIC	22.60	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.1	4.9	0.0
7F PLT.XVG	3040060104*	7, 19S, 15E	300	GIC	22.60	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.1	4.9	0.0
7F PLT #2	3040060104*	7, 19S, 15E	300	GIC	22.60	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.1	4.9	0.0
7F PLT #3	3040060104*	7, 19S, 15E	300	GIC	22.60	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.1	4.9	0.0
7F PLT #4	3040060104*	7, 19S, 15E	300	GIC	22.60	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.1	4.9	0.0
7F PLT #5	3040060104*	7, 19S, 15E	600	GIC	50.54	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.3	10.9	0.0
7F PLT #6	3040060104*	7, 19S, 15E	600	GIC	50.54	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.3	10.9	0.0
7F PLT #7	3040060104*	7, 19S, 15E	660	GIC	49.72	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.2	10.7	0.0
7F PLT #8	3040060104*	7, 19S, 15E	660	GIC	49.72	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.2	10.7	0.0
7F PLT #9	3040060104*	7, 19S, 15E	660	GIC	49.72	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.2	10.7	0.0
7F PLT #10	3040060104*	7, 19S, 15E	500	GIC	42.05	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.2	9.0	0.0
7F PLT #11	3040060104*	7, 19S, 15E	500	GIC	42.05	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.2	9.0	0.0
7F CRYO TWR1	3040060104*	7, 19S, 15E	130	GIC	10.18	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.1	2.2	0.0
7F CRYO TWR2	3040060104*	7, 19S, 15E	130	GIC	10.18	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.1	2.2	0.0
7F CRYO FDWTR	3040060104*	7, 19S, 15E	101	GIC	8.49	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	1.8	0.0
2-7F PLT #1	3040060105*	7, 19S, 15E	660	GIC	49.72	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.2	10.7	0.0
2-7F PLT #2	3040060105*	7, 19S, 15E	600	GIC	50.54	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.3	10.9	0.0
2-7F PLT #3	3040060105*	7, 19S, 15E	600	GIC	50.54	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.3	10.9	0.0
2-7F PLT #4	3040060105*	7, 19S, 15E	365	GIC	25.90	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.1	5.6	0.0
2-7F PLT H2O	3040060105*	7, 19S, 15E	104	GIC	7.71	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	1.7	0.0
2-7F PLT FAN	3040060105*	7, 19S, 15E	104	GIC	7.71	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	1.7	0.0
18F PLT #1	3040060106*	18, 19S, 15E	600	GIC	50.54	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.3	10.9	0.0
18F PLT #2	3040060106*	18, 19S, 15E	600	GIC	50.54	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.3	10.9	0.0
18F PLT #3	3040060106*	18, 19S, 15E	660	GIC	49.72	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.2	10.7	0.0
18F PLT FAN	3040060106*	18, 19S, 15E	104	GIC	7.71	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	1.7	0.0
18F PLT.H2O	3040060106*	18, 19S, 15E	104	GIC	7.71	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	1.7	0.0
WHISKEY HILL	3040060107*	7, 19S, 15E	300	GIC	25.23	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.1	5.4	0.0
7F H2O WELL	3040060108*	7, 19S, 15E	190	GIC	13.92	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.1	3.0	0.0
7F H2O BSTR	3040060108*	7, 19S, 15E	130	GIC	5.09	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	1.1	0.0
7F H2O BSTR	3040060108*	7, 19S, 15E	130	GIC	5.09	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	1.1	0.0
7F SMP H2O	3040060108*	7, 19S, 15E	68	GIC	6.01	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	1.3	0.0
7F FIRE ENG	3040060108*	7, 19S, 15E	130	GIC	0.60	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	0.1	0.0
7F FAN	3040060108*	7, 19S, 15E	101	GIC	8.66	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	1.9	0.0
7F FAN	3040060108*	7, 19S, 15E	101	GIC	8.66	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	1.9	0.0
PV SHPG	3040060109*	20, 20S, 15E	130	GIC	0.00	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	0.0	0.0
PV 64-20	3040060109*	20, 20S, 15E	104	GIC	7.71	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	1.7	0.0
PV 86-20	3040060109*	20, 20S, 15E	130	GIC	10.18	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.1	2.2	0.0
GH34F SHPG	3040060109*	34, 20S, 16E	130	GIC	0.00	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	0.0	0.0
GH34F SHPG	3040060109*	34, 20S, 16E	130	GIC	0.00	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	0.0	0.0
GH34F KOBE	3040060109*	34, 20S, 16E	130	GIC	0.00	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	0.0	0.0
GH55-34	3040060110*	34, 20S, 16E	130	GIC	0.00	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	0.0	0.0



1993



CALENDAR YEAR 1993 EMISSIONS																						
COMPANY NAME		UNOCAL OIL & GAS CENTAL CALIFORNIA																				
ADDRESS		CALAVERAS AVE																				
		P.O. BOX 1074																				
CITY, STATE, ZIP		COALINGA, CA 93210																				
NAME/TITLE OF RESPONSIBLE OFFICIAL		GEORGE N. FOLKS JR																				
PHONE NUMBER		(209) 935-0771																				
DEV ID	APCD PERMIT #	SECTION/OWNSHI RANGE	H P RATING	EQUIP. TYPE	FUEL FUEL USE	FUEL UNITS	PROCESS GAS HEAT CONT /PPM(S)	CONTROL DEVICE(S)	USE EMISSION FACTORS IN LB/MMCF OR LB/1000 GAL										SOURCE TEST (S-T) DATE	RANGE OF CELLS FOR S-T DATA IF AVG USED		
									FOR FUEL BURNING DEVICES					TONS/YEAR (TPY) = ((EF x FUEL USE)/2000) x %S (IF OIL-FIRED)							FRACTION	
									PM EF	CO EF	SOX EF	NOX EF	TOG EF	PM TPY	CO TPY	SOX TPY	NOX TPY	TOG TPY			ROG	RCG TPY
7F PLT #12	3040060101*	7,19S,15E	880	GIC	66.30	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.3	14.3	0.0	112.7	46.4	0.3965	18.4		
7F PLT #13	3040060102*	7,19S,15E	880	GIC	66.30	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.3	14.3	#VALUE!	112.7	46.4	0.3965	18.4		
7F PLT #14	3040060103*	7,19S,15E	880	GIC	66.30	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.3	14.3	0.0	112.7	46.4	0.3965	18.4		
7F PLT #1	3040060104*	7,19S,15E	300	GIC	22.60	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.1	4.9	0.0	38.4	15.8	0.3965	6.3		
7F PLT XVG	3040060104*	7,19S,15E	300	GIC	22.60	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.1	4.9	0.0	38.4	15.8	0.3965	6.3		
7F PLT #2	3040060104*	7,19S,15E	300	GIC	22.60	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.1	4.9	0.0	38.4	15.8	0.3965	6.3		
7F PLT #3	3040060104*	7,19S,15E	300	GIC	22.60	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.1	4.9	0.0	38.4	15.8	0.3965	6.3		
7F PLT #4	3040060104*	7,19S,15E	300	GIC	22.60	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.1	4.9	0.0	38.4	15.8	0.3965	6.3		
7F PLT #5	3040060104*	7,19S,15E	600	GIC	50.54	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.3	10.9	0.0	85.9	35.4	0.3965	14.0		
7F PLT #6	3040060104*	7,19S,15E	600	GIC	50.54	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.3	10.9	0.0	85.9	35.4	0.3965	14.0	5/20/92 & 11/23/88	
7F PLT #7	3040060104*	7,19S,15E	660	GIC	49.72	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.2	10.7	0.0	84.5	34.8	0.3965	13.8	5/20/92 & 11/23/88	
7F PLT #8	3040060104*	7,19S,15E	660	GIC	49.72	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.2	10.7	0.0	84.5	34.8	0.3965	13.8		
7F PLT #9	3040060104*	7,19S,15E	660	GIC	49.72	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.2	10.7	0.0	84.5	34.8	0.3965	13.8		
7F PLT #10	3040060104*	7,19S,15E	500	GIC	42.05	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.2	9.0	0.0	71.5	29.4	0.3965	11.7		
7F PLT #11	3040060104*	7,19S,15E	500	GIC	42.05	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.2	9.0	0.0	71.5	29.4	0.3965	11.7		
7F CRYO TWR1	3040060104*	7,19S,15E	130	GIC	10.18	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.1	2.2	0.0	17.3	7.1	0.3965	2.8		
7F CRYO TWR2	3040060104*	7,19S,15E	130	GIC	10.18	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.1	2.2	0.0	17.3	7.1	0.3965	2.8		
7F CRYO FDWT	3040060104*	7,19S,15E	101	GIC	8.49	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	1.8	0.0	14.4	5.9	0.3965	2.4		
2-7F PLT #1	3040060105*	7,19S,15E	660	GIC	49.72	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.2	10.7	0.0	84.5	34.8	0.3965	13.8	8/20/92 & 4/16/90	
2-7F PLT #2	3040060105*	7,19S,15E	600	GIC	50.54	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.3	10.9	0.0	85.9	35.4	0.3965	14.0		
2-7F PLT #3	3040060105*	7,19S,15E	600	GIC	50.54	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.3	10.9	0.0	85.9	35.4	0.3965	14.0		
2-7F PLT #4	3040060105*	7,19S,15E	365	GIC	25.90	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.1	5.6	0.0	44.0	18.1	0.3965	7.2		
2-7F PLT H2O	3040060105*	7,19S,15E	104	GIC	7.71	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	1.7	0.0	13.1	5.4	0.3965	2.1		
2-7F PLT FAN	3040060105*	7,19S,15E	104	GIC	7.71	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	1.7	0.0	13.1	5.4	0.3965	2.1		
18F PLT #1	3040060106*	18,19S,15	600	GIC	16.84	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.1	3.6	0.0	28.6	11.8	0.3965	4.7		
18F PLT #2	3040060106*	18,19S,15	600	GIC	16.84	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.1	3.6	0.0	28.6	11.8	0.3965	4.7		
18F PLT #3	3040060106*	18,19S,15	660	GIC	16.57	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.1	3.6	0.0	28.2	11.6	0.3965	4.6		
18F PLT FAN	3040060106*	18,19S,15	104	GIC	2.57	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	0.6	0.0	4.4	1.8	0.3965	0.7		
18F PLT H2O	3040060106*	18,19S,15	104	GIC	2.57	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	0.6	0.0	4.4	1.8	0.3965	0.7		
WHISKEY HILL	3040060107*	7,19S,15E	300	GIC	8.41	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	1.8	0.0	14.3	5.9	0.3965	2.3		
7F H2O WELL	3040060108*	7,19S,15E	190	GIC	13.92	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.1	3.0	0.0	23.7	9.7	0.3965	3.9		
7F H2O BSTR	3040060108*	7,19S,15E	130	GIC	5.09	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	1.1	0.0	8.7	3.6	0.3965	1.4		
7F H2O BSTR	3040060108*	7,19S,15E	130	GIC	5.09	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	1.1	0.0	8.7	3.6	0.3965	1.4		
7F SMP H2O	3040060108*	7,19S,15E	68	GIC	6.01	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	1.3	0.0	10.2	4.2	0.3965	1.7		
7F FIRE ENG.	3040060108*	7,19S,15E	130	GIC	0.60	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	0.1	0.0	1.0	0.4	0.3965	0.2		
7F FAN	3040060108*	7,19S,15E	101	GIC	8.66	MMCF	1054/0	N/A	10.000	430.000	0.600	3400.000	1400.000	0.0	1.9	0.0	14.7	6.1	0.3965	2.4		





**Appendix D: Days of Production from  
Coalinga Nose Unit**

CNU GAS PRODUCTION 1996															
May 96'		Jun. 96'		Jul. 96'		Aug. 96'		Sep. 96'		Oct. 96'		Nov. 96'		Dec. 96'	
1	65520	1	68748	1	66527	1	63215	1	63702	1	60524	1	54293	1	53344
2	68310	2	68005	2	66318	2	62649	2	63407	2	59944	2	56230	2	53033
3	68100	3	66910	3	64098	3	59091	3	63160	3	62336	3	57710	3	52100
4	68010	4	67090	4	65745	4	62652	4	62809	4	62430	4	57785	4	53053
5	67770	5	67340	5	66764	5	62315	5	62816	5	62432	5	56951	5	54194
6	62870	6	67366	6	66091	6	62225	6	62982	6	57329	6	56210	6	56831
7	62930	7	67311	7	65475	7	62028	7	62007	7	62313	7	55803	7	52219
8	64690	8	67318	8	65914	8	62067	8	62924	8	62064	8	54609	8	54091
9	65510	9	67377	9	66249	9	61933	9	62824	9	62243	9	55442	9	53413
10	66930	10	67199	10	64553	10	61837	10	62837	10	61940	10	54912	10	54554
11	67490	11	67333	11	64480	11	58730	11	62367	11	61548	11	55973	11	53712
12	64440	12	68247	12	65030	12	56436	12	62149	12	61564	12	55593	12	53105
13	67810	13	66188	13	64948	13	61147	13	62132	13	59812	13	55211	13	52524
14	65490	14	65664	14	61200	14	61241	14	62503	14	61068	14	56178	14	53247
15	65180	15	66990	15	64880	15	62271	15	56749	15	61030	15	55822	15	53454
16	65800	16	67510	16	64389	16	63591	16	62387	16	60900	16	55824	16	53045
17	66640	17	67128	17	63482	17	63322	17	62216	17	60927	17	52186	17	52695
18	66990	18	66721	18	63538	18	59140	18	62820	18	60903	18	55027	18	54648
19	67220	19	67158	19	64674	19	63238	19	62930	19	61012	19	54471	19	54540
20	67150	20	67694	20	64419	20	62902	20	62900	20	61087	20	54308	20	55210
21	66840	21	66474	21	62525	21	63073	21	62879	21	60400	21	54569	21	59380
22	65770	22	67457	22	64814	22	63030	22	62867	22	60460	22	53047	22	52560
23	66500	23	67574	23	64193	23	63050	23	62632	23	60517	23	53329	23	56902
24	67390	24	67397	24	64092	24	63020	24	63011	24	58629	24	53672	24	55668
25	66560	25	61289	25	63916	25	62898	25	63742	25	59060	25	53458	25	56273
26	66580	26	66978	26	64213	26	92742	26	63080	26	58711	26	53273	26	55315
27	67830	27	66230	27	64047	27	62845	27	62600	27	55331	27	54608	27	55216
28	60500	28	66262	28	64006	28	62644	28	62840	28	57547	28	53825	28	54340
29	69270	29	66249	29	63908	29	63432	29	62742	29	58849	29	53639	29	54227
30	69308	30	66416	30	63570	30	62235	30	62788	30	58161	30	53621	30	54289
31	69690			31	63281	31	62727			31	57246			31	54572

CNU GAS PRODUCTION 1997												
Jan. 97	Feb. 97'	Mar. 97'	Apr. 97'	May 97'	Jun. 97'	Jul. 97'	Aug. 97'	Sep. 97'	Oct. 97'	Nov. 97'	Dec.97'	
1 54306	1 50476	1 49512	1 48859	1 50102	1 47685	1 47797	1 46760	1 45412	1 43880	1 41291	1 41637	
2 52010	2 50862	2 49065	2 49496	2 50157	2 45478	2 47981	2 46397	2 44918	2 43697	2 41594	2 40140	
3 52647	3 50625	3 49071	3 49560	3 49650	3 48019	3 62680	3 46548	3 45425	3 43502	3 41540	3 40000	
4 51711	4 50572	4 48000	4 50297	4 49018	4 49015	4 47561	4 46209	4 45147	4 44346	4 41555	4 40350	
5 50328	5 50391	5 46716	5	5 49603	5 51043	5 47392	5 45439	5 44552	5 44086	5 41753	5 40054	
6 51742	6 51277	6 47140	6 48964	6 49637	6 50343	6 45267	6 46286	6 45099	6 43763	6 41448	6 39707	
7 51683	7 51676	7 47240	7 44358	7 49510	7 49144	7 47141	7 45980	7 44725	7 43667	7 41391	7 40556	
8 51029	8 51933	8 48657	8 47944	8 49363	8 48372	8 17537	8 45878	8 44623	8 43625	8 38482	8 40285	
9 51376	9 51460	9 49266	9 47812	9 49070	9 49127	9 47366	9 45872	9 44344	9 43460	9 41442	9 39618	
10 51807	10 50833	10 49264	10 48473	10 48694	10 48629	10 47187	10 45762	10 44414	10 42889	10 41032	10 38224	
11 52046	11 50467	11 48996	11 48696	11 46215	11 48961	11 47138	11 45282	11 45023	11 43532	11 40553	11 39304	
12 51140	12 50685	12 48896	12 48867	12 48039	12 48834	12 46650	12 45312	12 44555	12 43247	12 40110	12 39790	
13 48788	13 50294	13 48656	13 48350	13 48336	13 49055	13 46976	13 46024	13 44420	13 43247	13 40236	13 39887	
14 49034	14 49851	14 47834	14 47147	14 48925	14 48464	14 46926	14 46089	14 44256	14 42981	14 40631	14 39966	
15 50723	15 49838	15 48263	15 47063	15 48764	15 48114	15 46742	15 46265	15 44150	15 42792	15 40796	15 39725	
16 49886	16 50060	16 47225	16 47835	16 48511	16 46518	16 46916	16 46000	16 44341	16 42205	16 40941	16 39103	
17 50886	17 49663	17 48898	17	17 48879	17 47691	17 48239	17 45686	17 43907	17 42691	17 40018	17 39855	
18 80142	18 49213	18 47643	18 48512	18 48459	18 38516	18 47893	18 45290	18 43737	18 42604	18 39747	18 39650	
19 49474	19 49233	19 45595	19 48812	19 48766	19 45053	19 47529	19 45076	19 73566	19 42640	19 39410	19 38457	
20 48089	20 48966	20 44471	20 47234	20 47633	20 45211	20 47230	20 45530	20 46378	20 42613	20 39942	20 38494	
21 50156	21 48973	21 48500	21 47895	21 48180	21 45068	21 46404	21 45135	21 43513	21 42767	21 39496	21 37905	
22 45097	22 48741	22 48767	22 47868	22 48858	22 45567	22 46124	22 43930	22 43273	22 43261	22 39872	22 38314	
23 48358	23 48472	23 49128	23 48246	23 48589	23 46520	23 46099	23 45519	23 43141	23 42845	23 39709	23 39078	
24 50151	24 48614	24 48969	24 48847	24 48579	24 46351	24 47549	24 45011	24 43189	24 42882	24 3932	24 39043	
25 49715	25 48595	25 49410	25 49862	25 47901	25 45374	25 47456	25 45251	25 43546	25 42404	25 39737	25 38968	
26 49602	26 48940	26 49220	26 49589	26 47927	26 46863	26 46499	26 45944	26 44461	26 42474	26 39711	26 38835	
27 49891	27 49453	27 49086	27 49778	27 48025	27 47393	27 47175	27 45541	27 44061	27 42131	27 39764	27 38842	
28 49045	28 49203	28 49301	28 49572	28 48028	28 46104	28 47049	28 45298	28 44061	28 41900	28 40188	28 38327	
29 50815		29 50218	29 50273	29 47427	29 45885	29 46996	29 46114	29 44062	29 41906	29 40399	29 37335	
30 50993		30 49620	30 49976	30 48184	30 47204	30 47145	30 45620	30 43938	30 42360	30 40321	30 36177	
31 50145		31 49072		31 48472		31 46491	31 45575		31 42280		31 37095	

CNU GAS PRODUCTION 1998					
Jan. 98'		Feb. 98'		Mar. 98'	
1	36305	1	37837	1	34080
2	37385	2	37731	2	33840
3	37947	3	37888	3	35381
4	37954	4	37874	4	35772
5	37694	5	37441	5	35711
6	38779	6	36722	6	36023
7	39498	7	36091	7	35795
8	39242	8	36416	8	35765
9	38888	9	36485	9	33999
10	39062	10	37701	10	33735
11	38656	11	38012	11	33668
12	36409	12	38072	12	36051
13	36846	13	37582	13	35932
14	37488	14	37098	14	35165
15	37199	15	38855	15	34502
16	37166	16	38750	16	34349
17	36800	17	36404	17	34443
18	36508	18	36456	18	35146
19	37146	19	36169	19	34621
20	36935	20	34406	20	33955
21	36838	21	37098	21	33754
22	38437	22	34406	22	33798
23	37498	23	35571	23	33810
24	38236	24	34663	24	33725
25	38099	25	35571	25	33853
26	38112	26	35508	26	
27	37762	27	34589	27	
28	38065	28	34363	28	
29	37636			29	
30	38038			30	
31	37798			31	



Texaco Exploration  
and Production Inc

Box 5197X  
Bakersfield CA 93388  
805 392 2200  
FAX 805 392 2202

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**FEB 27 1997**

PERMIT SERVICES  
SUBMITTED

February 24, 1997

Mr. David Warner  
Manager, Permit Services  
SJVUAPCD - Central Region  
1999 Tuolumne Street, Suite 200  
Fresno, CA 93721-1638

**SUBJECT:** Applications for Emission Reduction Credit Certificates for Thirteen Internal Combustion Engines

Dear Mr. Warner:

The purpose of this submittal is to surrender the permits to operate for 13 gas-fired Internal Combustion Engines and to request Emission Reduction Credit Certificates. These internal combustion engines were permitted to operate within the Coalinga Nose Unit in Western Fresno County.

Enclosed with this submittal are the following:

- A. A check, Number 80057200 in the amount of \$650. to cover ERCC filing fees.
- B. Four ERC Certificate Applications.
- C. A spreadsheet, Attachment I, listing the engine unit designations, their previous permit to operate numbers and their current permit to operate numbers.
- D. Spreadsheets listing fuel usage for these units during 1992 and 1993.
- E. Attachment II which displays the calculations which were used to determine NOX emission reductions.

The pollutant reductions that are listed in Attachment I were established based on AP-42 for the SOX, ROG, PM-10 and CO emissions. These emission factors were then multiplied by the fuel usage numbers for 1992 and 1993 and then divided by 730 days. The NOX reductions that are listed in Attachment I were determined by using the emission limit from Table 3 in Section 5.1.3 of SJVUAPCD Rule 4701 and reducing that limit to zero.

Based on the records that we have obtained, none of these engines operated in 1994, 1995 or 1996. However, based on our fuel records these emissions were real and we are using accepted emission factors to quantify those emissions. Since these permits for these engines are being surrendered, these emissions are also permanent and enforceable. Therefore, we request that you issue these ERC Certificates to Texaco at your earliest convenience.

If you have any questions or comments regarding this submittal, please call Mike Polyniak at (805) 392-2299.

Sincerely,

S. L. Bulkeley  
EH&S Manager  
Bakersfield Region

enclosures  
1011env.doc

**ATTACHMENT II**  
**NOX ERC CALCULATIONS**

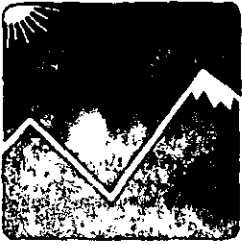
Fuel Rate in MMSCF/Year \* Air/Fuel Ratio for Natural Gas \* 75 parts/ Million Parts =  
Cubic Feet NO<sub>2</sub> \* Density of NO<sub>2</sub> @ 60 degrees F divided by 730 days for two years.

Fuel Rate for Binkley #1 = 23.13 MMSCF for 1992  
0.00 MMSCF for 1993.

Therefore:

23.13 MMSCF/2 years \* 32.452 A/F Ratio \* 75 parts/ 1,000,000 parts = 58,030.857 ft<sup>3</sup> NO<sub>2</sub>.

(58,030.857 ft<sup>3</sup> NO<sub>2</sub> \* 0.1214 Lbm/ft<sup>3</sup>) / 730 days = **9.651 Lbm/day NO<sub>2</sub>**.



San Joaquin Valley  
Unified Air Pollution Control District

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PERMIT SERVICES  
SJVUAPCD

APPLICATION FOR:

- EMISSION REDUCTION CREDIT (ERC)       ERC WITHDRAWAL  
 CONSOLIDATION OF ERC CERTIFICATES       ERC TRANSFER OF OWNERSHIP

1. ERC TO BE ISSUED TO: TEXACO EXPLORATION + PRODUCTION, INC.

2. MAILING ADDRESS:  
 STREET/P.O. BOX: STAR ROUTE BOX 42  
 CITY: SAN ARDO STATE: CA 9-DIGIT ZIP CODE: 93950

3. LOCATION OF REDUCTION:  
 STREET: \_\_\_\_\_  
 CITY: Coalinga  
 \_\_\_\_\_ /4 SECTION 7 TOWNSHIP 19S RANGE 15E

4. DATE OF REDUCTION: \_\_\_\_\_

5. PERMIT NO(S): \_\_\_\_\_ EXISTING ERC NO(S): \_\_\_\_\_

6. METHOD RESULTING IN EMISSION REDUCTION:  
 SHUTDOWN       RETROFIT       PROCESS CHANGE       OTHER  
 DESCRIPTION: \_\_\_\_\_

(Use additional sheets if necessary)

7. REQUESTED ERCS (In Pounds Per Calendar Quarter):

	VOC	NOx	CO	PM-10	SOx	OTHER
1ST QUARTER	<u>783.90</u>	<u>1,263.29</u>	<u>1,783.35</u>	<u>41.99</u>	<u>2.52</u>	
2ND QUARTER	<u>792.61</u>	<u>1,277.28</u>	<u>1,803.17</u>	<u>41.95</u>	<u>2.55</u>	
3RD QUARTER	<u>801.32</u>	<u>1,291.31</u>	<u>1,822.98</u>	<u>42.41</u>	<u>2.58</u>	
4TH QUARTER	<u>801.32</u>	<u>1,291.31</u>	<u>1,822.98</u>	<u>42.41</u>	<u>2.58</u>	

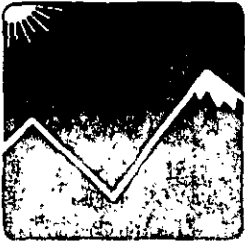
8. SIGNATURE OF APPLICANT: [Signature] TYPE OR PRINT TITLE OF APPLICANT: Vice President, Bakersfield Region

9. TYPE OR PRINT NAME OF APPLICANT: M. E. MILLS DATE: \_\_\_\_\_ TELEPHONE NO.: 392-2299

FOR APCD USE ONLY:

DATE STAMP <b>RECEIVED</b> MAR 03 1997 FINANCE <u>e</u> SJVUAPCD	FILING FEE RECEIVED: \$ <u>650<sup>00</sup></u> ICK# <u>80057200</u> DATE PAID: <u>pm 2-27-97</u> PROJECT NO.: <u>970158</u> FACILITY ID.: <u>2885</u>
--	--





San Joaquin Valley  
Unified Air Pollution Control District

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PERMIT SERVICES  
SJVUAPCD

APPLICATION FOR:

- EMISSION REDUCTION CREDIT (ERC)       ERC WITHDRAWAL  
 CONSOLIDATION OF ERC CERTIFICATES       ERC TRANSFER OF OWNERSHIP

1. ERC TO BE ISSUED TO: TEXACO EXPLORATION + PRODUCTION, INC.

2. MAILING ADDRESS:  
 STREET/P.O. BOX: STAR ROUTE BOX 92  
 CITY: SAN ARDO STATE: CA 9-DIGIT ZIP CODE: 93950

3. LOCATION OF REDUCTION:  
 STREET: \_\_\_\_\_  
 CITY: Coalinga  
14 SECTION 31 TOWNSHIP 19S RANGE 15E

4. DATE OF REDUCTION: \_\_\_\_\_

5. PERMIT NO(S): \_\_\_\_\_ EXISTING ERC NO(S): \_\_\_\_\_

6. METHOD RESULTING IN EMISSION REDUCTION:  
 SHUTDOWN       RETROFIT       PROCESS CHANGE       OTHER  
 DESCRIPTION: \_\_\_\_\_  
 (Use additional sheets if necessary)

7. REQUESTED ERCS (In Pounds Per Calendar Quarter):

	VOC	NOx	CO	PM-10	SOx	OTHER
1ST QUARTER	1,609.20	2,593.26	3,661.02	8.51	5.07	
2ND QUARTER	1,627.08	2,622.07	3,701.70	8.61	5.10	
3RD QUARTER	1,644.96	2,650.89	3,742.38	8.70	5.15	
4TH QUARTER	1,644.96	2,650.89	3,742.38	8.70	5.15	

8. SIGNATURE OF APPLICANT: [Signature] TYPE OR PRINT TITLE OF APPLICANT: Vice President, Bakersfield Region

9. TYPE OR PRINT NAME OF APPLICANT: M. E. MILLS DATE: \_\_\_\_\_ TELEPHONE NO: 392-2299

FOR APCD USE ONLY:

DATE STAMP <b>RECEIVED</b> MAR 03 1997 FINANCE SJVUAPCD	FILING FEE RECEIVED: \$ _____
	DATE PAID: _____
	PROJECT NO.: <u>970158</u> FACILITY ID.: <u>2885</u>



San Joaquin Valley  
Unified Air Pollution Control District

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FEB 27 1997

PERMIT SERVICES  
SJVUAPCD

APPLICATION FOR:

- EMISSION REDUCTION CREDIT (ERC)       ERC WITHDRAWAL  
 CONSOLIDATION OF ERC CERTIFICATES       ERC TRANSFER OF OWNERSHIP

1. ERC TO BE ISSUED TO:  
*TEXACO EXPLORATION + PRODUCTION, INC.*

2. MAILING ADDRESS:  
STREET/P.O. BOX: *STAR ROUTE BOX 42*  
CITY: *SAN ARDO* STATE: *CA* 9-DIGIT ZIP CODE: *93450*

3. LOCATION OF REDUCTION:  
STREET: \_\_\_\_\_  
CITY: *Coalinga*  
SECTION *19* TOWNSHIP *20 S* RANGE *15 E*

4. DATE OF REDUCTION: \_\_\_\_\_

5. PERMIT NO(S): \_\_\_\_\_ EXISTING ERC NO(S): \_\_\_\_\_

6. METHOD RESULTING IN EMISSION REDUCTION:  
 SHUTDOWN       RETROFIT       PROCESS CHANGE       OTHER  
DESCRIPTION: \_\_\_\_\_

(Use additional sheets if necessary)

7. REQUESTED ERCS (In Pounds Per Calendar Quarter):

	VOC	NOx	CO	PM-10	SOx	OTHER
1ST QUARTER	<i>4,710.15</i>	<i>7,590.51</i>	<i>10,716.21</i>	<i>299.21</i>	<i>11.34</i>	
2ND QUARTER	<i>4,762.49</i>	<i>7,674.85</i>	<i>10,835.28</i>	<i>251.98</i>	<i>11.97</i>	
3RD QUARTER	<i>4,814.82</i>	<i>7,759.19</i>	<i>10,954.35</i>	<i>254.75</i>	<i>11.59</i>	
4TH QUARTER	<i>4,814.82</i>	<i>7,759.19</i>	<i>10,954.35</i>	<i>254.75</i>	<i>11.59</i>	

8. SIGNATURE OF APPLICANT: *[Signature]* TYPE OR PRINT TITLE OF APPLICANT: *Vice President, Bakersfield Region*

9. TYPE OR PRINT NAME OF APPLICANT: *M. E. MILLS* DATE: \_\_\_\_\_ TELEPHONE NO.: *392-2299*

FOR APCD USE ONLY:

<p>RECEIVED</p> <p>MAR 03 1997</p> <p>FINANCE SJVUAPCD</p>	FILING FEE RECEIVED: \$ <u>          1          </u>
	DATE PAID: _____
	PROJECT NO.: <u>970158</u> FACILITY ID.: <u>2885</u>



San Joaquin Valley  
Unified Air Pollution Control District

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FEB 27 1997

PERMIT SERVICES  
SJVUAPCD

APPLICATION FOR:

- EMISSION REDUCTION CREDIT (ERC)       ERC WITHDRAWAL  
 CONSOLIDATION OF ERC CERTIFICATES       ERC TRANSFER OF OWNERSHIP

1. ERC TO BE ISSUED TO: TEXACO EXPLORATION + PRODUCTION, INC.

2. MAILING ADDRESS:  
 STREET/P.O. BOX: STAR ROUTE BOX 92  
 CITY: SAN ARDO STATE: CA 9-DIGIT ZIP CODE: 93450

3. LOCATION OF REDUCTION:  
 STREET: \_\_\_\_\_  
 CITY: Coalinga  
 /4 SECTION 24 TOWNSHIP 20S RANGE 15E

4. DATE OF REDUCTION: \_\_\_\_\_

5. PERMIT NO(S): \_\_\_\_\_ EXISTING ERC NO(S): \_\_\_\_\_

6. METHOD RESULTING IN EMISSION REDUCTION:  
 SHUTDOWN       RETROFIT       PROCESS CHANGE       OTHER  
 DESCRIPTION: \_\_\_\_\_

(Use additional sheets if necessary)

7. REQUESTED ERCS (In Pounds Per Calendar Quarter):

	VOC	NOx	CO	PM-10	SOx	OTHER
1ST QUARTER	<u>2,177.46</u>	<u>3,509.19</u>	<u>4,959.19</u>	<u>115.38</u>	<u>6.84</u>	
2ND QUARTER	<u>2,201.65</u>	<u>3,548.18</u>	<u>5,009.19</u>	<u>116.66</u>	<u>6.92</u>	
3RD QUARTER	<u>2,225.85</u>	<u>3,587.17</u>	<u>5,069.23</u>	<u>117.94</u>	<u>6.99</u>	
4TH QUARTER	<u>2,225.85</u>	<u>3,587.17</u>	<u>5,069.23</u>	<u>117.94</u>	<u>6.99</u>	

8. SIGNATURE OF APPLICANT: M. E. Mills TYPE OR PRINT TITLE OF APPLICANT: Vice President, Bakersfield Region

9. TYPE OR PRINT NAME OF APPLICANT: M. E. Mills DATE: \_\_\_\_\_ TELEPHONE NO: 392-2299

FOR APCD USE ONLY:

DATE STAMP  
**RECEIVED**  
 MAR 03 1997

FILING FEE RECEIVED: \$ 1

DATE PAID: \_\_\_\_\_

PROJECT NO.: 970158 FACILITY ID.: 2885

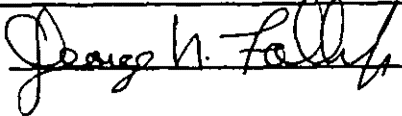
FRESNO COUNTY AIR POLLUTION CONTROL DISTRICT  
P.O. Box 11867, 1221 Fulton Mall  
Fresno California 93775  
Telephone: (209) 445-3239

1989 PRODUCTION DATA FORM

COMPANY NAME Unocal Corporation DATE February 26 19 90  
REPORTING PERIOD: From January 1 19 89 to December 31 19 89

Process Name/ Permit Number	Materials Used/ Processed/or Fuel(s) Burned	Max. Daily Throughput or Consumption	Total Annual Throughput Consumption	Operating Schedule		
				Hr/Day	Day/Wk	Wk/Yr
3040060101	Natural Gas	181,632 SCF	66,295,680 SCF	24	7	52
3040060102	Natural Gas	181,632 SCF	66,295,680 SCF	24	7	52
3040060103	Natural Gas	181,632 SCF	66,295,680 SCF	24	7	52
3040060104	Natural Gas	1,304,664 SCF	476,202,360 SCF	24	7	52
3040060105	Natural Gas	526,342 SCF	192,114,830 SCF	24	7	52
3040060106	Natural Gas	455,386 SCF	166,215,890 SCF	24	7	52
3040060107	Natural Gas	69,120 SCF	25,228,800 SCF	24	7	52
3040060108	Natural Gas	184,862 SCF	67,474,630 SCF	24	7	52
3040060109	Natural Gas	160,620 SCF	58,626,300 SCF	24	7	52
3040060110	Natural Gas	104,820 SCF	38,259,300 SCF	24	7	52
3040060111	Natural Gas	307,236 SCF	112,141,140 SCF	24	7	52
3040060112	Natural Gas	415,401 SCF	151,621,365 SCF	24	7	52
3040060113	Natural Gas	141,912 SCF	51,797,880 SCF	24	7	52

Name George N. Folks Jr. Title Environmental Specialist

Signature 

## COMPRESSORS

#	EQUIP. LOCATION	EQUIP. MANUFACTURE	SERIAL NUMBER	EQUIP. TYPE	HP RATING	FUEL						NATL/GAS {SCP/DAY}
						CONSUMP. (BTU/HP-HR)	NOX (LB/DAY)	CO (LB/DAY)	HC (LB/DAY)	SO2 (LB/DAY)	PM (LB/DAY)	
1	7-F PLT.	CLARK	20137	RA-3	300	10,000	306.9	38.8	126.4	0.23	NA	61,920
1A	7-F PLT.	INGERSOLL	8EV948	XVG-8	300	9,000	248.6	31.4	102.4	0.19	NA	61,920
2	7-F PLT.	CLARK	22253	RA-3	300	10,000	306.9	38.8	126.4	0.23	NA	61,920
3	7-F PLT.	CLARK	22286	RA-3	300	10,000	306.9	38.8	126.4	0.23	NA	61,920
4	7-F PLT.	CLARK	22345	RA-3	300	10,000	306.9	38.8	126.4	0.23	NA	61,920
5	7-F PLT.	CLARK	A21152	RA-6	600	10,000	613.8	77.6	252.7	0.46	NA	138,461
6	7-F PLT.	CLARK	A21174	RA-6	600	10,000	613.8	77.6	252.7	0.46	NA	138,461
7	7-F PLT.	CLARK	A21264	HRA-6	660	9,000	546.9	69.2	225.2	0.41	NA	136,224
8	7-F PLT.	CLARK	A2265	HRA-6	660	9,000	546.9	69.2	225.2	0.41	NA	136,224
9	7-F PLT.	CLARK	A21266	HRA-6	660	9,000	546.9	69.2	225.2	0.41	NA	136,224
10	7-F PLT.	CLARK	22627	RA-5	500	10,000	511.5	64.7	210.6	0.38	NA	115,200
11	7-F PLT.	CLARK	22606	RA-5	500	10,000	511.5	64.7	210.6	0.38	NA	115,200
12	7-F PLT.	CLARK	A25624	HRA-8	880	9,000	729.1	92.2	300.2	0.54	NA	181,632
13	7-F PLT.	CLARK	A25625	HRA-8	880	9,000	729.1	92.2	300.2	0.54	NA	181,632
14	7-F PLT.	CLARK	A25623	HRA-8	880	9,000	729.1	92.2	300.2	0.54	NA	181,632
1	31B PLT.	COOPER	43259	GMX-6	365	8,500	269.8	34.1	111.1	0.20	NA	70,956
2	31B PLT.	COOPER	42922	GMX-6	365	8,500	269.8	34.1	111.1	0.20	NA	70,956
1	18F PLT.	CLARK	A21486	RA-6	600	10,000	613.8	77.6	252.7	0.46	NA	138,461
2	18F PLT.	CLARK	A21487	RA-6	600	10,000	613.8	77.6	252.7	0.46	NA	138,461
3	18F PLT.	CLARK	A21123	HRA-6	660	9,000	546.9	69.2	225.2	0.41	NA	136,224
1	19F PLT.	CLARK	22616	RA-5	500	10,000	511.5	64.7	210.6	0.38	NA	115,200
2	19F PLT.	CLARK	22617	RA-5	500	10,000	511.5	64.7	210.6	0.38	NA	115,200
3	19F PLT.	CLARK	A21062	RA-6	600	10,000	613.8	77.6	252.7	0.46	NA	138,461
1	2-7F PLT.	CLARK	21345	HRA-6	660	9,000	546.9	69.2	225.2	0.41	NA	136,224
2	2-7F PLT.	CLARK	21352	RA-6	600	10,000	613.8	77.6	252.7	0.46	NA	138,461
3	2-7F PLT.	CLARK	21346	RA-6	600	10,000	613.8	77.6	252.7	0.46	NA	138,461
4	2-7F PLT.	COOPER	42683	GMX-6	365	8,500	269.8	34.1	111.1	0.20	NA	70,956
1	BINK PLT.	CLARK	39540	MA-8	300	10,000	306.9	38.8	126.4	0.23	NA	69,120
2	BINK PLT.	CLARK	50503	HMA-6	265	9,000	219.6	27.8	90.4	0.16	NA	54,696
3	BINK PLT.	CLARK	38537	MA-6	225	10,000	230.2	29.1	94.8	0.17	NA	51,840
4	BINK PLT.	CLARK	38509	MA-6	225	10,000	230.2	29.1	94.8	0.17	NA	51,840
5	BINK PLT.	CLARK	38510	MA-6	225	10,000	230.2	29.1	94.8	0.17	NA	51,840
1	WHISKY H1.	CLARK	39508	MA-8	300	10,000	306.9	38.8	126.4	0.23	NA	69,120

TABLE OF CONVERSIONS1. Reference Values

Molecular Weight - MW

MW NO	- 30.0 g/mole	MW CO	- 28.0 g/mole
MW NO <sub>2</sub>	- 46.0 g/mole	MW THG	- 18 g/mole
MW NO <sub>x</sub>	- 30.8 g/mole	MW NMHC	- 33 g mole

Typical rich burn exhaust flow rate - 98 scfh/bhp

Typical lean burn exhaust flow rate - 130 scfh/bhp

Standard mole volume - 22.4 liters/mole

1 ft<sup>3</sup> - 28.32 liters

scfh - 12.3826 \* lb/hr of exhaust

$$\text{scfh} = \text{acfh} * \left( \frac{330}{\phi_F + 460} \right) * \left( \frac{\text{in W.C.} + 408}{408} \right)$$
2. Conversions

a. g/bhp-hr to ppm

$$\frac{\text{g/bhp-hr}}{\text{exhaust flow (scfh)}} * \text{bhp} * \frac{1}{\text{MW}} * 790,960.452 = \text{ppm} \quad \text{① 15\% O}_2$$

b. lb/hr to ppm

$$\frac{\text{lb/hr}}{\text{exhaust flow (scfh)}} * \frac{454 \text{ g}}{\text{lb}} * \frac{1}{\text{MW}} * 790,960.452 = \text{ppm}$$



# PROJECT ROUTING FORM

PROJECT NUMBER: 970158 FACILITY ID: 2885 PERMIT NOS: \_\_\_\_\_

APPLICANT NAME: TEXACO EXPLORATION & PRODUCTION, INC.

PREMISE ADDRESS: STAR ROUTE BOX 42, SAN ARDO CA

PRELIMINARY REVIEW	ENGR	DATE	SUPR	DATE
A. Application Deemed Incomplete		Revised	4/13/98	WFG
B. Application Deemed Complete <input type="checkbox"/> Awaiting CB Offsets	10FG	3/4/98	W	4/14/98
C. Application Pending Denial				
D. Application Denied				

ENGINEERING EVALUATION	INIT	DATE
E. Engineering Evaluation Complete	SR	10/12/98
F. Supervising Engineer Approval	JVC	10/1/98
G. Compliance Division Approval <input type="checkbox"/> Not Required		
H. Permit Services Manager Approval	MS	10/20

Director Review:  Not Required  Required

SW 1/7

prelim to SS  
finals to SS

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

- PRELIMINARY REVIEW**
- \_\_\_\_\_ 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**

- 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.
- FINAL DECISION:**  \_\_\_\_\_ Deliver Ad to the Newspaper NOT LATER THAN \_\_\_\_\_  
 \_\_\_\_\_ Mail copies of Cover Letter and ATC(s) to Distribution.  
 \_\_\_\_\_ Mail copies of Cover Letter to Distribution.

*JVC 7/1/99*

**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  \_\_\_\_\_ SJVUAPCD - 1999 Tuolumne St., Fresno, CA 93721 Attn: Seyed Sadredin
- \_\_\_\_\_ PREMISE FILE
- \_\_\_\_\_ BLDG DEPT \_\_\_\_\_  \_\_\_\_\_ OTHER \_\_\_\_\_
- \_\_\_\_\_ FIRE DEPT \_\_\_\_\_  \_\_\_\_\_ SCHOOL \_\_\_\_\_





San Joaquin Valley  
Unified Air Pollution Control District

**Fax Transmittal ( 3rd Floor )**

1999 Tuolumne Street, Suite 200  
Fresno, California 93721  
Phone (209) 497-1100 Fax (209) 233-2203

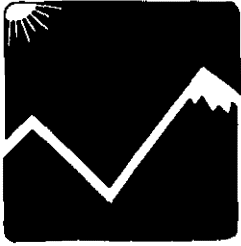
Date : 11/13/99  
 To : MIKE POLYNIAK Fax Number : \_\_\_\_\_  
 From : STEVE ROEDER Number of pages (including cover sheet): \_\_\_\_\_

Description : ORIGINALS SHOULD BE THERE VERY SOON.  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

- |                          |                         |                          |                      |
|--------------------------|-------------------------|--------------------------|----------------------|
| <input type="checkbox"/> | Per Your Request        | <input type="checkbox"/> | For Your Information |
| <input type="checkbox"/> | Per Our Conversation    | <input type="checkbox"/> | For Your Approval    |
| <input type="checkbox"/> | Take Appropriate Action | <input type="checkbox"/> | Review & Comment     |
| <input type="checkbox"/> | Please Answer           | <input type="checkbox"/> | Review & Return      |

Original transmittal will follow via mail

Remarks / Response : \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_



# San Joaquin Valley Unified Air Pollution Control District

April 15, 1998

Mike Polyniak  
Texaco Exploration and Production Company  
Star Route Box 42  
San Ardo, CA 93450



**Re: Receipt of Complete Application**  
**Project Number:970158**

Dear Mr. Polyniak: 768-3326  
805 762-8214 fax 762-8323

HOME  
805-397-8300


The District has completed a preliminary review of your application for emission reduction credits (ERCs) for the shutdown of thirteen internal combustion that were involved in natural gas production in the Fresno County Oilfield.

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

*In general, complete applications are processed on a first-come first-served basis. If you have any questions, please contact Mr. David Warner at (209) 497-1100.*

Sincerely,

Seyed Sadredin  
Director of Permit Services

  
David Warner  
Permit Services Manager

wfg

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 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 • Bakersfield, CA 93301  
(805) 862-5200 • Fax (805) 862-5201

DATE: April 2, 1998

TO: Wendy Fairchild Garcia

FROM: Mike Polyniak

SUBJECT: I. C. Engine Fuel Use for Coalinga Nose Unit

Dear Wendy:

Attached, as we discussed, are the additional data that I've gathered for the Coalinga Nose Unit I. C. Engines. Hopefully this will help you in determining whether these engines operated at a higher rate in the recent past. I've also included an engineering evaluation dated September 14, 1993. In that evaluation, the District Engineer provides fuel useage data for eight consecutive calendar quarters. I've included that too.

Since we have only operated this unit since 1996 this data is sketchy, but it's the best I could come up with. If you need additional data I will have to travel to Coalinga and dig through their very old files.

If you have additional questions or comments, please call me at (805) 762-8323.

Sincerely,

  
Mike Polyniak

**RECEIVED**  
**APR 06 1998**  
PERMIT SERVICES  
SJVUAPCD

**ERC APPLICATION  
PRELIMINARY REVIEW**

Project #970158

**Engineer:** Wendy Garcia

**Date:** March 4, 1998

**Facility:** Texaco Exploration and Production, Inc.

**Mailing Address:** Star Route Box 42, San Ardo, CA 93450

**Contact Name:** Mike Polyniak

**Phone:** (805) 392-2299

**Date Application Received:** February 27, 1997

**Date Deemed Complete:** March 5, 1998

**I. Summary**

The primary business of this facility is oilfield gas production. Texaco has submitted applications to bank CO, NO<sub>x</sub>, PM<sub>10</sub>, SO<sub>x</sub>, and VOC emission reduction credits (ERCs) for shutdown of thirteen (13) gas-fired I.C. engines. The facility surrendered their Permits to Operate (PTOs) with the original applications received on February 27, 1997. Copies of the permits are presented in Attachment A.

**II. Applicable Rules**

Rule 2201 New and Modified Stationary Source Review Rule (06/15/95)

Rule 2301 Emission Reduction Credit Banking

**III. Location of Reduction**

The physical location of the equipment was at:

Section 7, Township 19S, Range 15E; Gas Production, Fresno County

Section 19F, Township 19S, Range 15E; Gas Production, Fresno County

Section 31B, Township 19S, Range 15E; Gas Production, Fresno County

Section 24, Township 19S, Range 15E; Gas Production, Fresno County

- VOC: 1 g/hp-hr = 212 ppmv
- Annual emissions will be rounded to the nearest pound in accordance with District Policy NSR/ERC 8.
- Annual fuel use is assumed to be divided evenly among the four quarters.

## 2. Emission Factors

Actual emission reductions, as defined in Rule 2201, Section 3.2.3, are reductions beyond reductions attributed to control measures, a District air quality plan, or other laws. Emission limits for I.C. engines are required by District Rule 4701 for CO, NO<sub>x</sub> and VOC. Therefore emission factors for these pollutants are taken from Rule 4701, Table 3, for Engine Type 3.b.

Emission factors for PM<sub>10</sub> and SO<sub>x</sub> are from EPA publication 450-4-90-003 "Airs Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Pollutants," section - Natural Gas Commercial I.C. Engines.

**Table 1. Emission Factors for Calculation of Actual Emission Reductions**

	Rule 4701 Emission Limit ppmv, corrected to 15% O <sub>2</sub>	g/hp-hr	lb/MMscf
CO	2000	16.67	
NO <sub>x</sub>	75	1.03	
PM <sub>10</sub>			10
SO <sub>x</sub>			0.6
VOC	750	3.54	

## B. Baseline Period Determination and Data

As defined in Rule 2201, the baseline period consists of two years immediately preceding the date of reduction, or at least two consecutive years within five years prior to the ATC application, if they are more representative of "normal source operation" (Rule 2201, Section 3.7).

The emissions reductions involved in this project result from the shut-down of engines. According to District Rule 2301 Emission Reduction Credit Banking Section 3.11, the date of shutdown for permitted sources shall be the date of surrender of the operating permits or the cessation of emissions, whichever is earlier. Fuel use records show that the engines were last operated in 1993. However, the engines were maintained in operable condition until the surrender of permits in 1997. Because of the variable nature of oilfield operations, the District expects that Texaco intended to operate the engines if needed. Therefore, the date permits were surrendered is considered the shut-down date. The permits were surrendered on February 27, 1997.

The last five years of operation from February 27 1992 to February 27, 1997 will be used to determine the baseline period. The engines were operated only in 1992 and 1993 during this period. Natural gas production has decreased significantly in the area over the years, which may have contributed to Texaco's decision to shut-down these engines. Fuel use data from 1989 show that the compressor engines were used at a higher rate in the past (see Attachment B). Therefore the baseline period, reflecting normal source operation with respect to the past five years, will be 1992-1993, because the operating years better reflect the engines' historical use.

Actual emission reductions, as defined in Rule 2201, Section 3.2.3, are reductions beyond reductions attributed to control measures, a District air quality plan, or other laws. Therefore, the baseline emissions must be adjusted to meet emission limits on existing permits to operate (PTOs). The PTOs which specify fuel use limits are listed below.

Permit	Fuel Use [scf/day]
C-2885-15-0	42,300
C-2885-17-0	254,000
C-2885-18-0	103,000

The applicant has provided annual fuel use records (see Attachment B). Table 2 shows the annual emissions adjusted to meet the permitted fuel use limits. The quarterly totals are the annual amounts divided by four. As shown in Table 2, there are no fuel usage records available for 1994-1996 because the engines did not operate during this time. Therefore, 1992 and 1993 will be used to represent normal source operations and the baseline emissions.

#### **IV. Method of Generating Reductions**

The facility was permitted to operate thirteen (13) gas-fired I.C. engines as follows:

Texaco Permit	Unocal Permit	Fresno County Permit	Quantity	Description
C-2885-15-0	C-1659-61-0	3040060107	1	300 hp natural gas fired I.C. engine, S/N 39508, ID #1, located at Whiskey HL Plant. The engine drives a gas compressor.
C-2885-17-0	C-1659-63-0	3040060112	5	1802 hp natural gas fired I.C. engines at the 19F Plant.: (2) 500 hp (S/N 22616 & 22617); 600 hp (S/N A21062) for driving gas compressors; and (2) 101 hp for pump/fans.
C-2885-18-0	C-1659-64-0	3040060113	2	(2) 365 hp (ID #1 & 2) natural gas fired I.C. engines located at Site 31B driving gas compressors.
C-2885-22-0	C-1659-62-0	3040060111	1	300 hp natural gas fired I.C. engine (ID #1), Clark Model HMA-8, driving gas compressors.
C-2885-23-0	C-1659-62-0	3040060111	1	265 hp natural gas fired I.C. engine (ID #2), Clark Model HMA-6, driving gas compressors.
C-2885-24-0	C-1659-62-0	3040060111	1	225 hp natural gas fired I.C. engine (ID #3), Clark Model MA-6, driving gas compressors.
C-2885-25-0	C-1659-62-0	3040060111	1	225 hp natural gas fired I.C. engine (ID #4), Clark Model MA-6, driving gas compressors.
C-2885-26-0	C-1659-62-0	3040060111	1	225 hp natural gas fired I.C. engine (ID #5), Clark Model MA-36, driving gas compressors.

#### **V. Calculations**

##### **A. Assumptions and Emission Factors**

##### **1. Assumptions**

- Natural gas heating value is 1054 Btu/scf per the applicant.
- Engines are lean-burn ( per applicant for similar units listed in Compliance Plan for Rule 4701 - Attachment C)
- Conversion factors for ppmv @ 15%O<sub>2</sub> to g/hp-hr for lean-burn engines are [Ref. EPA-453/R-93-032 "Alternative Control Techniques Document--NO<sub>x</sub> Emissions from Stationary Reciprocating Internal Combustion Engines":
  - CO: 1 g/hp-hr = 120 ppmv
  - NO<sub>x</sub>: 1 g/hp-hr = 73 ppmv

Table 2: Historic Fuel Usage							
Permit	Hp	Unit	1992 Fuel Usage				
			1st Qtr [MMscf]	2nd Qtr [MMscf]	3rd Qtr [MMscf]	4th Qtr [MMscf]	Annual [MMscf]
C-2885-15-0 <sup>1</sup>	300	Whiskey Hill	3.86	3.86	3.86	3.86	15.44
C-2885-17-0 <sup>2</sup>	500	19F Plt #1	6.43	6.43	6.43	6.43	25.71
	500	19F Plt #2	6.43	6.43	6.43	3.50	25.71
	600	19F Plt #1	7.73	7.73	7.73	7.73	7.73
	101	19F Plt Fan	1.30	1.30	1.30	1.30	5.19
	101	19F Plt H <sub>2</sub> O	1.30	1.30	1.30	1.30	5.19
C-2885-18-0	365	31-B- Plt	6.48	6.48	6.48	6.48	25.90
	365	31-B-Plt	6.48	6.48	6.48	6.48	25.90
C-2885-22-0	300	Binkley #1	5.78	5.78	5.78	5.78	23.13
C-2885-23-0	265	Binkley #2	4.58	4.58	4.58	4.58	18.30
C-2885-24-0	225	Binkley #3	4.34	4.34	4.34	4.34	17.34
C-2885-25-0	225	Binkley #4	4.34	4.34	4.34	4.34	17.34
C-2885-26-0	225	Binkley #5	4.34	4.34	4.34	4.34	17.34
Quarterly Total Fuel Use			63.39	63.39	63.39	63.39	
1993 Fuel Usage							
Permit	Hp	Unit	1993 Fuel Usage				
			1st Qtr [MMscf]	2nd Qtr [MMscf]	3rd Qtr [MMscf]	4th Qtr [MMscf]	Annual [MMscf]
C-2885-15-0	300	Whiskey Hill	2.10	2.10	2.10	2.10	8.41
C-2885-17-0	500	19F Plt #1	3.50	3.50	3.50	3.50	14.01
	500	19F Plt #2	3.50	3.50	3.50	3.50	14.01
	600	19F Plt #1	4.21	4.21	4.21	4.21	16.84
	101	19F Plt Fan	0.71	0.71	0.71	0.71	2.83
	101	19F Plt H <sub>2</sub> O	0.71	0.71	0.71	0.71	2.83
C-2885-18-0	365	31-B- Plt	2.16	2.16	2.16	2.16	8.63
	365	31-B-Plt	2.16	2.16	2.16	2.16	8.63
C-2885-22-0	300	Binkley #1	0.00	0.00	0.00	0.00	0.00
C-2885-23-0	265	Binkley #2	0.00	0.00	0.00	0.00	0.00
C-2885-24-0	225	Binkley #3	0.00	0.00	0.00	0.00	0.00
C-2885-25-0	225	Binkley #4	0.00	0.00	0.00	0.00	0.00
C-2885-26-0	225	Binkley #5	0.00	0.00	0.00	0.00	0.00
Quarterly Total Fuel Use			19.05	19.05	19.05	19.05	

#17 total = 365(224,000) = 92,710,000  
 total hp = 1602 = 51,448.39 per hp/yr

1	25724195	→	25.72
2	25724195		25.72
3	30869034		36.87
4	51962824		5.20
5	51962824		5.20

<sup>1</sup> Actual fuel use was in excess of permit limit. Therefore historic fuel use adjusted:  
 42,300 scf/day x 365 day/yr = 15.44 MMscf/yr

<sup>2</sup> Total fuel use of 151.62 MMscf/yr is in excess of permit limit (92.71 MMscf/yr).  
 Annual use rates adjusted to the allowable total based upon each engines percentage contribution to the total.



Considering the historical production data for 1992 and 1993 given in Table 2, the average quarterly fuel use for the baseline period is:

Table 3: Baseline Historical Fuel Usage			
1st Quarter [MMscf]	2nd Quarter [MMscf]	3rd Quarter [MMscf]	4th Quarter [MMscf]
41.22	41.22	41.22	41.22

This two-year period is considered most representative of normal source operation level.

### 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 historical average fuel usage during the baseline period is multiplied by the combustion emission factors.

The HAE will be presented in Table 4.

Sample calculation for C-2885-15-0:

$$\begin{aligned} \text{PM}_{10} &= (25.23 \text{ MMscf/yr})(10 \text{ lb/MMscf}) \\ &= 252 \text{ lb/yr} \\ \text{SO}_x &= (25.23 \text{ MMscf/yr})(0.6 \text{ lb/MMscf}) \\ &= 15 \text{ lb/yr} \end{aligned}$$

### D. Adjustments to HAE

Pursuant to Section 6.2.1 of Rule 2201, Historical Actual Emissions must be discounted for any emissions reductions proposed in the District Air Quality Plan for attaining the annual reductions required by the California Clean Air Act.

There is no applicable regulatory measure according to District's list of regulatory measures scheduled for consideration. In this case, adjustment to HAE is not required.

### E. Actual Emissions Reductions (AER)

Per Rule 2201, Section 6.5.2, the Actual Emissions Reductions due to shutdown of an emissions unit is:

$$\text{AER} = \text{HAE (for the unit prior to shutdown)}$$

AER will be presented as Table 5.

**F. Air Quality Improvement Deduction (AQID)**

The air quality improvement deduction per Rule 2201, Section 6.5, is 10% of the Actual Emissions Reductions, and will be presented as Table 6.

**G. Increases in Permitted Emissions (IPE)**

No IPE associated with this project.

**H. Bankable Emissions Reductions Credits**

ERC = AER - AQID

The bankable emissions reduction credits will be determined by subtraction of the Air Quality Improvement Deduction (Table 6) from the AER (Table 5), and will be presented as Table 7.

Table 7: Bankable Emissions Reduction Credits				
	1st Quarter [lb/qtr]	2nd Quarter [lb/qtr]	3rd Quarter [lb/qtr]	4th Quarter [lb/qtr]
C-2885-15-0				
C-2885-17-0				
C-2885-18-0				
C-2885-22-0				
C-2885-23-0				
C-2885-24-0				
C-2885-25-0				
C-2885-26-0				

**VI. Compliance**

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

**A. Real**

The emissions reductions are generated by the shutdown of the processing equipment. The emissions reductions are calculated from actual historic fuel usage data and approved emission factors. Therefore, the reductions are real.

**B. Enforceable**

The Permits to Operate (PTOs) for the engines have been surrendered. The equipment cannot be legally operated without a valid PTO. Therefore, the reductions are enforceable.

**C. Quantifiable**

Reduction amounts are calculated based on historic fuel usage data and approved emission factors. Therefore, the reductions are quantifiable.

**D. Permanent**

The equipment has been shutdown and the PTOs surrendered. Further operation requires prior District approval by filing an application. Therefore, the reductions are permanent.

**E. Surplus**

Texaco voluntarily shutdown their engines and is not required to by any law, rule, agreement, regulation, nor attributed to a control measure noticed for workshop or contained in the District Air Quality Attainment Plan. Therefore, the reductions are surplus.

**F. Not used for the approval of an Authority to Construct or as offsets**

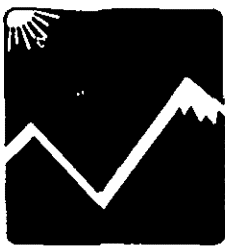
The emission reduction credits generated by the shutdown of the test operation have not been used for the approval of any Authority to Construct or as offsets.

**G. Timely submittal**

The permits for the engines were surrendered on February 17, 1997, which is the shutdown date of the equipment. The ERC application was submitted March 3, 1997. Therefore, the application was submitted in a timely fashion, within 180 days of the shutdown, in compliance with Sections 4.2.3 and 5.5 of Rule 2301.

**VII. Recommendation**

Based on this Preliminary Review, I recommend that the Emission Reduction Credit application can be deemed complete and the attached completeness letter issued.



San Joaquin Valley  
Unified Air Pollution Control District

Certified Mail

September 14, 1993

George Folks  
Environmental Specialist  
Unocal Corp.  
P.O. Box 1074  
Coalinga, CA 93210

*Handy:  
Page 7 of this Project Analysis  
provides quarterly fuel consumption  
from 4th quarter 1990 to 4th  
quarter 1992.*

*Mike*

Re: Application #920394  
Project Description: Ten Waukesha I.C. Engines

Dear Mr. Folks:

On October 26, 1992, the Air Pollution Control District received the above referenced application for Authority to Construct. The District has completed its review of the application and has determined offsets are required for the increase in permitted emissions of non-methane hydrocarbons (VOC) and carbon monoxide. Attached is a copy of the engineering analysis. The quantity of offsets required is 58,661 pounds CO and 85,005 pounds VOC per calendar quarter as shown on page 10.

Since the District's review indicates offsets are required, Unocal must identify the source of offsets or provide better emissions data (such as source tests or manufacturer's information) than those shown in the engineering analysis. Enclosed is a list of banked emission reduction credits. We request this information be identified and submitted to the District within 30 days of your receipt of this letter. Failure to provide the requested information may result in the denial of your project.

Thank you for your cooperation in this matter. Should you have any questions, please telephone Mr. David Warner at (209) 497-1100.

Sincerely,

Seyed Sadredin  
Director of Permit Services

David Warner  
Permit Services Manager - Central Region

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

Enclosures

mk

1999 Tuolumne Street, Suite 200 • Fresno, CA 93721 • (209) 497-1000 • FAX (209) 233-2057

Northern Region

4230 Kiernan Avenue, Suite 130 • Modesto, CA 95356  
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Southern Region

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# Application Review

Project # 920394  
Deemed Complete: 12/15/92

Engineer: Martin Keast  
Date: May 17, 1993

Facility Name: Unocal Corp.  
Mailing Address: P.O. Box 1074  
Coalinga, CA 93210

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Application: C-1659-38-0 through C-1659-47-0

## Section 1 - Proposal

Unocal Corporation operates oil and natural gas production operations at the Coalinga Nose Unit near Coalinga, CA. This facility currently operates many internal combustion engines for gas compression. Unocal proposes to replace 33 existing i.c. engines with 10 BACT-equipped engines and later apply for emission reduction credits.

The total horsepower rating before modification was 16275, and after is 14780. Since total HP is not being increased, the new engines are viewed as functionally identical equipment.

## Section 2 - Applicable Rules

Rule 2020 Exemptions (Adopted 12/17/92)  
Rule 2201 New and Modified Stationary Source Review Rule  
(Adopted 12/17/92)  
Rule 3010 Permit Fee (Adopted 12/17/92)  
Rule 4101 Visible Emissions (Adopted 12/17/92)  
Rule 4102 Nuisance (Adopted 12/17/92)

## Section 3 - Project Location

There is no school within 1,000 feet from the equipment location.

Section 4 - Process Description

The 33 existing engines are fueled by natural gas. These engines are used to drive compressors which ship produced gas to sales pipelines. The engines operate up to 24 hours a day, 7 days a week, 52 weeks per year.

Section 5 - Equipment Listing

Table 1			
Existing I.C. Engines to be Cancelled			
PTO Number	I.D.	Location	HP Rating
3040060104	1	7-F	300
3040060104	1A	7-F	300
3040060104	2	7-F	300
3040060104	3	7-F	300
3040060104	4	7-F	300
3040060104	5	7-F	600
3040060104	6	7-F	600
3040060104	7	7-F	660
3040060104	8	7-F	660
3040060104	9	7-F	660
3040060104	10	7-F	500
3040060104	11	7-F	500
3040060101	12	7-F	880
3040060102	13	7-F	880
3040060103	14	7-F	880
3040060113	1	31-B	365
3040060113	2	31-B	365
3040060106	1	18F	600
3040060106	2	18F	600
3040060106	3	18F	660
3040060112	1	19F	500
3040060112	2	19F	500

Table 1			
3040060112	3	19F	600
3040060105	1	2-7F	660
3040060105	2	2-7F	600
3040060105	3	2-7F	600
3040060105	4	2-7F	365
3040060111	1	BINK	300
3040060111	2	BINK	265
3040060111	3	BINK	225
3040060111	4	BINK	225
3040060111	5	BINK	225
3040060107	1	WH	300
Total 37	-	-	16275

The new equipment consists of ten 1478 bhp Waukesha 7042 GL turbocharged lean combustion gas engines designed for low emissions and fuel efficiency. Catalytic reduction is achieved by a Houston Industrial Sciences DeNOx Silencer models #HISCR-55012C or #HISCR-55012CL. Total combined rating for ten engines is 14780 hp.

#### Section 6 - Control Equipment Evaluation

Emissions from the natural gas fired engines are controlled by lean burn design employing a prechamber combustion system fitted into the cylinder head. The leaner fuel mixture lowers combustion temperature spikes, thereby reducing thermal NOx formation. CO and unburned hydrocarbons are inherently lower due to consistently stable combustion of very lean fuel mixtures. However CO and NMHC emissions are significantly higher in the lean-burn design than the conventional design.

#### Section 7 - Calculations

##### A. ASSUMPTIONS MADE:

1. The emissions will be calculated based on operating 24 hours per day, 365 days per year. There are no operating limitations on the existing permits. The existing engine emission factors are based on AP-42, Table 3.2-1.

2. The new engine emission levels are based on the manufacturer (Waukesha) guarantee of 1.5 grams NOx/bhp-hr, 2.4 gm CO/bhp hr, and 1.7 gm NMHC/bhp-hr, while burning field production gas. PM<sub>10</sub> and SOx emissions are negligible. These emission levels are deemed BACT by the District.

**B. EMISSION CALCULATIONS:**

1. Calculation of HAPE.

Historical Adjusted Potential Emissions (HAPE) is the potential to emit prior to modification adjusted for the proposed control efficiency. Ce exists only for the pollutants controlled over the old system. Therefore CE for CO and VOC are equal to zero.

HAPE is equal to the potential to emit of the existing i.c. engines being fired on natural gas at 91 days per quarter times the proposed control efficiency. Uncontrolled emission factors are from AP-42, Table 3.2-1.

$$CE_{NOx} = (11 - 1.5) (\text{gm/hp-hr}) / (11 \text{ gm/hp/hr}) = 86\%$$

$$CE_{CO} = 0$$

$$CE_{NMHC} = 0$$

$$HAPE = PEPM (1-CE)$$

$$\begin{aligned} HAPE_{NOx1} &= (300 \text{ hp}) (24 \text{ lb}/1000 \text{ hp-hr}) (24*91 \text{ hr/qtr}) (0.86) \\ &= 13523 \text{ lb/qtr} \end{aligned}$$

$$\begin{aligned} HAPE_{CO1} &= (300 \text{ hp}) (3.1 \text{ lb}/1000 \text{ hp-hr}) (24*91 \text{ hr/qtr}) (1-0) \\ &= -1442 \text{ lb/qtr} (15.84 \text{ lb/day}) \end{aligned}$$

$$\begin{aligned} HAPE_{NMHC1} &= (300\text{hp}) (0.97 \text{ lb}/1000\text{hp-hr}) (24*91 \text{ hr/qtr}) (1-0) \\ &= -1818 \text{ lb/qtr} \end{aligned}$$



Table 2

## Historical Adjusted Potential Emissions (HAPE)

PTO Number	ID	Loc.	HP	NOx	CO	NMHC
3040060104	1	7-F	300	13523✓	2031	636
3040060104	1A	7-F	300	13523	2031	636
3040060104	2	7-F	300	13523	2031	636
3040060104	3	7-F	300	13523	2031	636
3040060104	4	7-F	300	13523	2031	636
3040060104	5	7-F	600	27046	4062	1271
3040060104	6	7-F	600	27046	4062	1271
3040060104	7	7-F	660	29751	4468	1398
3040060104	8	7-F	660	29751	4468	1398
3040060104	9	7-F	660	29751	4468	1398
3040060104	10	7-F	500	22538	3385	1059
3040060104	11	7-F	500	22538	3385	1059
3040060101	12	7-F	880	39667	5958	1864
3040060102	13	7-F	880	39667	5958	1864
3040060103	14	7-F	880	39667	5958	1864
3040060113	1	31-B	365	16453	2471	773
3040060113	2	31-B	365	16453	2471	773
3040060106	1	18F	600	27046	4062	1271
3040060106	2	18F	600	27046	4062	1271
3040060106	3	18F	660	29751	4468	1398
3040060112	1	19F	500	22538	3385	1059
3040060112	2	19F	500	22538	3385	1059
3040060112	3	19F	600	27046	4062	1271
3040060105	1	2-7F	660	29751	4468	1398
3040060105	2	2-7F	600	27046	4062	1271
3040060105	3	2-7F	600	27046	4062	1271
3040060105	4	2-7F	365	16453	2174	773

3040060111	1	BINK	300	13523	2031	636
3040060111	2	BINK	265	11946	1794	561
3040060111	3	BINK	225	10142	1523	477
3040060111	4	BINK	225	10142	1523	477
3040060111	5	BINK	225	10142	1532	477
3040060107	1	WH	300	13523	2031	636
<b>Total</b>	-	-	-	733622	109893	34478

## 2. Calculation for PE

The Potential to Emit (PE) for each new engine will be calculated as follows:

$$\begin{aligned}
 \text{NOx} &= (1.5 \text{ gm/bhp-hr}) * (1478 \text{ bhp}) * (24 \text{ hr/d}) / (454 \text{ gm/lb}) \\
 &= 117.2 \text{ lb/day} * 91 \text{ d/qtr} \\
 &= 10548 \text{ lb/qtr}
 \end{aligned}$$

$$\begin{aligned}
 \text{CO} &= (2.4 \text{ gm/bhp-hr}) * (1478 \text{ bhp}) * (24 \text{ hr/d}) / (454 \text{ gm/lb}) \\
 &= 187.5 \text{ lb/day} * 91 \text{ d/qtr} \\
 &= 16875 \text{ lb/qtr}
 \end{aligned}$$

$$\begin{aligned}
 \text{NMHC} &= (1.7 \text{ gm/bhp-hr}) * (1478 \text{ bhp}) * (24 \text{ hr/d}) / (454 \text{ gm/lb}) \\
 &= 132.8 \text{ lb/day} * 91 \text{ d/qtr} \\
 &= 11952 \text{ lb/qtr}
 \end{aligned}$$

Pollutant	lbs/hr	lb/day	lbs/qtr	Combined lbs/qtr
NOx (NO <sub>2</sub> )	4.88	117.2	10548	105480
CO	7.81	187.5	16875	168750
NMHC	5.53	132.8	11952	119520

## 3. Increase in Potential to Emit (IPE)

For functionally identical replacement equipment, IPE = PE (for replacement unit) - HAPE (unit being replaced). IPE is shown in Table 4:

Table 4		
Increase in Potential to Emit (IPE)		
Pollutant	lbs/qtr	lbs/day
NOx (NO <sub>2</sub> )	-628,142	-6903
CO	58,857	646.8
NMHC	85,042	934.5

Negative values for IPE are set to zero. Therefore offsets are not required for NOx.

Offsets are required for CO and NMHC in the amounts of their IPE.

5. Historical Actual Emissions (HAE)

HAE can be calculated using fuel consumption data and emission factors from AP-42, Table 3.2-1 (attached). The quality of the field gas is the same as utility grade natural gas as it is treated at sweetening plants prior to compression into the pipeline or as fuel. The fuel consumption data is for 33 existing engines combined. The data is tabulated this way because all of these engine have identical emission factors.

Table 5				
Fuel Consumption (scf/qtr)				
Qtr	1990	1991	1992	Average
1	-	267985	322536	295261
2	-	304250	283457	293854
3	-	316335	291591	303963
4	235190	344094	-	289642
Total	-	-	-	1182720

Sample calculation:

$$\text{NOx}_{Q1} = (3400 \text{ lb}/10^6\text{scf}) * (295267 \text{ scf}/\text{qtr}) = 1004 \text{ lb}/\text{qtr}$$

$$\text{CO}_{Q1} = (430 \text{ lb}/10^6\text{scf}) * (295267 \text{ scf}/\text{qtr}) = 127 \text{ lb}/\text{qtr}$$

$$\text{NMHC}_{\text{Q1}} = (1400 \text{ lb}/10^6\text{scf}) * (295267 \text{ scf}/\text{qtr}) * (0.1) = 41.3 \text{ lb}/\text{qtr}$$

$$\text{SOx}_{\text{Q1}} = (0.6 \text{ lb}/10^6\text{scf}) * (295267 \text{ scf}/\text{qtr}) = 0.2 \text{ lb}/\text{qtr}$$

Negligible.

PM<sub>10</sub> = not available. Negligible.

Table 6			
Historical Actual Emissions (HAE) lbs			
Qtr	NOx	CO	NMHC
1	1004	127	41.3
2	999	126	41.1
3	1033	131	42.6
4	985	125	40.5
Total	4021	509	166

4. Community Bank Allowance (CB)

The CB allowance is equal to 10% of the HAE and is shown in Table 7.

Table 7			
Community Bank Allowance (CB) lbs			
Qtr	NOx	CO	NMHC
1	100	12.7	4.1
2	100	12.6	4.1
3	103	13.1	4.3
4	98.5	12.5	4.1
Total	401.5	50.9	16.6

*Should not apply USA changing.*

5. Actual Emission Reductions (AER)

The AER is equal to the HAE less the CB allowance and is shown in Table 8. The AER may be subtracted from the offset requirement or banked for future use. Since offsets are required for CO and VOC they will be subtracted from the offset requirement. The NOx AER amount is bankable.

Table 8			
Actual Emission Reductions (AER) lbs			
Qtr	NOx	CO	NMHC
1	904	114.3	37.2
2	899	113.4	37.0
3	930	117.9	38.3
4	886.5	112.5	36.4
Total	3618.5	785.1	149.4

6. NSR Balance

The NSR Balance for this stationary source includes all increases in the daily emission limitations of CO, PM<sub>10</sub>, and SOx since the 1977 baseline date for Fresno County. The offset trigger level for SOx is 150 lb/day, PM is 80 lb/day, and CO is 550 lb/day. Since there is no increase in SOx and PM<sub>10</sub>, no offsets are required for those pollutants. The IPE for CO exceeds 550 lbs/day and offsets are required.

Section 8 - Compliance

The proposed project complies with the following District Rules as stated below:

Rule 2020 Exemptions

The engines as proposed requires District permit per Section III.A.3.

Rule 2201 New and Modified Stationary Source Review Rule

Compliance with this rule is expected based for the following:

\* **BACT Requirement:**

Emissions from the i.c. engines are controlled by natural gas fired with lean burn combustion design. This has been determined to be BACT by the District.

\* **Offset Requirement**

Per Rule 2201, Section 4.2.2, offsets are required in the amounts of 58,661 lbs CO/qtr and 85,005 lbs NMHC/qtr.

- **Administrative Requirements**

Since offsets are required, it is necessary to public notice this project.

**Rule 4001 Visible Emissions**

No visible emissions exceeding No 1 on Ringelmann Chart are expected.

**Rule 4002 Nuisance**

Nuisance conditions are not expected.

**Section 9 - Recommendation**

Based on the above compliance summary in Section 8, I recommend denial of the Authority to Construct permit for ten engines.

**Section 10 - Billing Information**

One filing fee was paid with the application. Nine other filing fees have been billed for and have been paid (ie. 9 \* \$60.00 = \$540.00). No additional fees are currently due.

A rating fee will be required for each Authority to Construct implemented. Assuming that the applicant will proceed with installing all engines requested, a rating fee of \$665.00 will be required for each engine.

**Attachments**

AP-42, Table 3.2-1.  
Draft ATC #C-1659-38-0