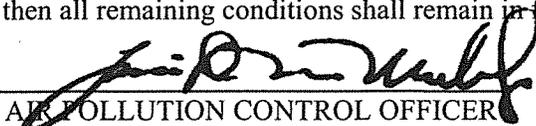




Permit Reevaluation
Permit to Operate No. 08699 - R6

EQUIPMENT OWNER: Southern California Gas Company
EQUIPMENT OPERATOR: Southern California Gas Company
EQUIPMENT LOCATION: So Cal Gas - Pitas Point location
STATIONARY SOURCE NAME/NUMBER: So Cal Gas - Pitas Point / 02405
FACILITY NAME/NUMBER: Pitas Point O & M / 02405

- (1) Keep this *Permit Reevaluation* document with PTO 8699.
- (2) All equipment lists and descriptions and all permit conditions and requirements of PTO 8699 are incorporated herein by this reference as part of PTO 08699 - R6 and remain unchanged, valid and fully enforceable.
- (3) This *Permit Reevaluation* does not authorize any change in equipment description, location, process or any physical or operational modification.
- (4) Pursuant to Health & Safety Code section 42300(b) and District Rule 201.G, your permit is valid for one year and is eligible for extension upon the payment of all fees. Failure to pay outstanding fees shall result in the nonrenewal and expiration of this permit. The permittee may reinstate the expired permit by paying all outstanding fees (including properly assessed penalty fees).
- (5) The Permittee shall defend, indemnify and hold harmless the District or its agents, officers and employees from any claim, action or proceeding against the District or its agents, officers or employees, to attack, set aside, void, or annul, in whole or in part, the approval granted herein. In the event that the District fails promptly to notify the Permittee of any such claim, action or proceeding, or that the District fails to cooperate fully in the defense of said claim, this condition shall thereafter be of no force or effect. In the event that any condition contained herein is determined to be invalid, then all remaining conditions shall remain in force.


AIR POLLUTION CONTROL OFFICER

APR 19 2012

DATE

Notes:

- Stationary sources are subject to an annual emission fee (see Fee Schedule B-3 of Rule 210).
- Annual reports are due by March 1st of each year.
- Next Reevaluation Due Date: 05/01/2015.

S:\WP\Oil&Gas\GSD\02405 SoCal Gas Pitas Point O&M\Reeval 8699-R6\Reeval 08699 R6 - Stamped Issuance Reeval - 4-18-2012.doc



Permit to Operate 08699 - R5

Page 1 of 5

EQUIPMENT OWNER:

Southern California Gas Company

300800

EQUIPMENT OPERATOR:

Southern California Gas Company

EQUIPMENT LOCATION:

5619 Carpinteria Avenue, Carpinteria, California

STATIONARY SOURCE/FACILITY:

So Cal Gas - Pitas Point
Pitas Point O & M

SSID: 02405
FID: 02405

EQUIPMENT DESCRIPTION:

The equipment subject to this permit is listed in the table at the end of this permit.

PROJECT/PROCESS DESCRIPTION:

This facility is a natural gas odorant and metering station. The facility measures the volume of natural gas, analyzes the hydrogen sulfide (H₂S) content and odorizes the natural gas with tetrahydrothiophane prior to delivery to Southern California Gas Company's sales system. The equipment emits reactive organic compounds (ROC) from the liquid level controller, the odorizer, the gas sampler and the H₂S analyzer which are vented through the carbon canister. ROCs are also emitted from the adsorption system, valves, flanges and fittings. Metering pumps inject odorant into gas delivered by pipeline from Platform Habitat. The odorant storage tank is filled by a tanker truck equipped with a closed loop vapor recovery system.

Permit to Operate 08699 - R5

Page 2 of 5

CONDITIONS:

1. **Emission Limitations.** The mass emissions from the equipment permitted herein shall not exceed the values listed in Table 1. Compliance shall be based on the operational, monitoring, recordkeeping, and reporting conditions of this permit.

Table 1
Permitted ROC Emissions

	lb/day	TPY
Fugitive Emissions	27.18	4.96
Equipment Bleed Rates	1.46	0.27
Total	28.64	5.23

2. **Operational Restrictions.** The equipment permitted herein is subject to the following operational restrictions:
 - a. The total facility throughput of natural gas shall not exceed 110 MMscfd.
 - b. Odorant tanks shall be filled by a truck using a closed-loop system. Odorant emissions shall not be detectable, by olfactory senses, at the property boundary during tank filling operations.
 - c. Emissions from the odorizer, the gas sampler and the H₂S analyzer shall be vented through the carbon canister system.
 - d. The granulated activated carbon adsorbent used to control odors at the facility shall be completely replaced with virgin (or regenerated) adsorbent at a minimum of once every ninety (90) days.
 - e. The transfer of liquids from the underground storage tank into any vessel shall be conducted with the use of a vapor recovery system or other control method demonstrated by the permittee to the Control Officer to be at least 95 percent effective in recovering organic compound vapors.
3. **Monitoring.** The equipment permitted herein is subject to the following monitoring requirements:
 - a. The hydrogen sulfide (H₂S) monitor must be properly operated and maintained in accordance with the equipment manufacturer's manual to detect the presence of H₂S in the natural gas. The monitor shall be set to trigger the shutdown of the facility if the H₂S concentration exceeds eight (8.0) parts per million volume.

Permit to Operate 08699 - R5

Page 3 of 5

- b. The permittee shall perform a gas analysis on a monthly basis.
4. **Recordkeeping.** The permittee shall record and maintain the following information. This data shall be maintained for a minimum of three (3) years from the date of each entry and made available to the APCD upon request:
 - a. The volume of odorant delivered to the facility and the dates of odorant deliveries.
 - b. The number of odorant deliveries.
 - c. The date of adsorbent replacement, the type of replacement adsorbent and the quantity (pounds of adsorbent) of the replacement adsorbent.
 - d. The volume, in MMscfd, of facility natural gas throughput.
 - e. The date, volume (gallons) of liquid transferred, method of transfer, type of system used to recover organic compound vapors and ultimate destination of the liquids transferred from the underground storage tank.
 - f. Results of monthly gas analyses.
 5. **Reporting.** By March 1 of each year, a written report documenting compliance with the terms and conditions of this permit for the previous calendar year shall be provided by the permittee to the APCD (Attn: *Annual Report Coordinator*). The report shall contain information necessary to verify compliance with the emission limits and other requirements of this permit. The report shall be in a format approved by the APCD. All logs and other basic source data not included in the report shall be made available to the APCD upon request. The report shall include the following information:
 - a. The volume of odorant delivered to the facility and the dates of odorant deliveries.
 - b. The number of odorant deliveries.
 - c. The dates of adsorbent replacement, the type of replacement adsorbent, and the quantity (pounds of adsorbent) of the replacement adsorbent.
 - d. The volume, in MMscf/yr, of facility natural gas throughput.
 - e. The maximum daily volume, in MMscf, of natural gas processed during the calendar year.
 - f. The date, volume (gallons) of liquid transferred, method of transfer, type of system used to recover organic compound vapors, and ultimate destination of the liquids transferred from the underground storage tank.

Permit to Operate 08699 - R5

Page 4 of 5

- g. Results of monthly gas analyses.
6. **Consistency with Analysis.** Operation under this permit shall be conducted consistent with all data, specifications and assumptions included with the application and supplements thereof (as documented in the APCD's project file) and the APCD's analyses under which this permit is issued as documented in the Permit Analyses prepared for and issued with the permit.
 7. **Equipment Maintenance.** The equipment listed in this permit shall be properly maintained and kept in good condition at all times. The equipment manufacturer's maintenance manual, maintenance procedures and/or maintenance checklists (if any) shall be kept on site. In lieu of maintaining the equipment manufacturer's maintenance manual, maintenance procedures and/or maintenance checklists onsite, the permittee may store this information off-site and shall bring the documents to the site when maintenance activities are required and during all announced APCD inspections.
 8. **Compliance.** Nothing contained within this permit shall be construed as allowing the violation of any local, state or federal rules, regulations, air quality standards or increments.
 9. **Severability.** In the event that any condition herein is determined to be invalid, all other conditions shall remain in force.
 10. **Conflict Between Permits.** The requirements or limits that are more protective of air quality shall apply if any conflict arises between the requirements and limits of this permit and any other permitting actions associated with the equipment permitted herein.
 11. **Access to Records and Facilities.** As to any condition that requires for its effective enforcement the inspection of records or facilities by the APCD or its agents, the permittee shall make such records available or provide access to such facilities upon notice from the APCD. Access shall mean access consistent with California Health and Safety Code Section 41510 and Clean Air Act Section 114A.
 12. **Equipment Identification.** Identifying tag(s) or name plate(s) shall be displayed on the equipment to show manufacturer, model number, and serial number. The tag(s) or plate(s) shall be issued by the manufacturer and shall be affixed to the equipment in a permanent and conspicuous position.
 13. **Emission Factor Revisions.** The APCD may update the emission factors for any calculation based on USEPA AP-42 or APCD emission factors at the next permit modification or permit reevaluation to account for USEPA and/or APCD revisions to the underlying emission factors.
 14. **Nuisance.** Except as otherwise provided in Section 41705 of the California H&SC, no person shall discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such

Permit to Operate 08699 - R5

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persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

15. **Grounds for Revocation.** Failure to abide by and faithfully comply with this permit or any Rule, Order, or Regulation may constitute grounds for revocation pursuant to California Health & Safety Code Section 42307 *et seq.*



AIR POLLUTION CONTROL OFFICER

APR 16 2009

DATE

Attachments:

- Permit Equipment List
- Permit Evaluation for Permit to Operate 08699 - R5

Notes:

- Reevaluation Due Date: January 18, 2012.
- Stationary sources are subject to an annual emission fee (see Fee Schedule B-3 of Rule 210).
- Annual reports are due by March 1st of each year.
- This permit supersedes Permit to Operate 08699 - R4.

Equipment List for Permit to Operate 08699 - R5

Page 1 of 7

Monday, March 23, 2009

Santa Barbara County APCD – Equipment List

Reeval 08699 R5 / FID: 02405 Pitas Point O & M / SSID: 02405

A PERMITTED EQUIPMENT

1 Natural Gas Odorant and Metering Station

1.1 Odorant storage tank

<i>Device ID #</i>	106871	<i>Device Name</i>	Odorant storage tank
<i>Rated Heat Input</i>		<i>Physical Size</i>	1200.00 Gallons
<i>Manufacturer</i>		<i>Operator ID</i>	1066-C
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Outside diameter: 5.0 feet, length: 12.0 feet, relief valve setting: 40.0 psig, relief valve ID# 249-C.		

1.2 Liquid Level Controller

<i>Device ID #</i>	106872	<i>Device Name</i>	Liquid Level Controller
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Fisher	<i>Operator ID</i>	5852
<i>Model</i>	Leveltrol 2500	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Air operated, bleed gas rate: 4.2 scf/hr.		

Equipment List for Permit to Operate 08699 - R5

Page 2 of 7

1.3 Odorizer

<i>Device ID #</i>	106873	<i>Device Name</i>	Odorizer
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Morgan	<i>Operator ID</i>	
<i>Model</i>	HD-562-3K	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Air operated, bleed gas rate: 4.2 scf/hr.		

1.4 Gas Sampler

<i>Device ID #</i>	106874	<i>Device Name</i>	Gas Sampler
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	YZ Industries	<i>Operator ID</i>	
<i>Model</i>	2010	<i>Serial Number</i>	7285
<i>Location Note</i>			
<i>Device Description</i>	Bleed gas rate: 0.018 scf/hr		

1.5 Hydrogen Sulfide Analyzer

<i>Device ID #</i>	106875	<i>Device Name</i>	Hydrogen Sulfide Analyzer
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Delmar Scientific	<i>Operator ID</i>	1199
<i>Model</i>	1100	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Analyzer set points: 3.0 ppm alarm and 6.0 ppm shutdown.		

Equipment List for Permit to Operate 08699 - R5

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1.6 Carbon Filter

<i>Device ID #</i>	106876	<i>Device Name</i>	Carbon Filter
<i>Rated Heat Input</i>		<i>Physical Size</i>	7.00 Pounds Activated Carbon
<i>Manufacturer</i>	Southern California Gas Company	<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Vessel dimensions: outside diameter: 6.0 inches, length: 30.0 inches, carbon capacity: 7.0 pounds		

1.7 Horizontal Separator

<i>Device ID #</i>	106877	<i>Device Name</i>	Horizontal Separator
<i>Rated Heat Input</i>		<i>Physical Size</i>	102.00 Gallons
<i>Manufacturer</i>	Peerless	<i>Operator ID</i>	
<i>Model</i>	97H-A8	<i>Serial Number</i>	83-185-1
<i>Location Note</i>			
<i>Device Description</i>	Diameter: 36.0 inches, length: 126.0 inches, capacity: 102 gallons, relief valve setting: 1,200 psig, relief valve ID# 246-C		

Separator

Equipment List for Permit to Operate 08699 - R5

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1.8 Underground Excess Liquid Storage Tank

<i>Device ID #</i>	106878	<i>Device Name</i>	Underground Excess Liquid Storage Tank
<i>Rated Heat Input</i>		<i>Physical Size</i>	1350.00 Gallons
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	(piece of pipe)
<i>Location Note</i>			for overflow
<i>Device Description</i>			

1.9 Odorant Filter

<i>Device ID #</i>	106879	<i>Device Name</i>	Odorant Filter
<i>Rated Heat Input</i>		<i>Physical Size</i>	7.00 Pounds Activated Carbon
<i>Manufacturer</i>	Williams	<i>Operator ID</i>	
<i>Model</i>	VF-7S	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Outside diameter: 5.0 inches, length: 12.0 inches, carbon capacity: 7.0 pounds		

1.10 Fugitive Components - Component Count Method

1.10.1 Valves

<i>Device ID #</i>	106885	<i>Device Name</i>	Valves
<i>Rated Heat Input</i>		<i>Physical Size</i>	108 valves in gas gas/condensate service.
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>			

Equipment List for Permit to Operate 08699 - R5

Page 5 of 7

1.10.2 Connections

<i>Device ID #</i>	106886	<i>Device Name</i>	Connections
<i>Rated Heat Input</i>		<i>Physical Size</i>	468 Connections.
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>			
<i>Description</i>			

1.10.3 Relief Valves

<i>Device ID #</i>	106887	<i>Device Name</i>	Relief Valves
<i>Rated Heat Input</i>		<i>Physical Size</i>	4 PSVs.
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>			
<i>Description</i>			

C OFF PERMIT EQUIPMENT

1 Natural Gas Transfer Station

2 Odorant Filter

<i>Device ID #</i>	106879	<i>Device Name</i>	Odorant Filter
<i>Rated Heat Input</i>		<i>Physical Size</i>	7.00 Pounds Activated Carbon
<i>Manufacturer</i>	Williams	<i>Operator ID</i>	
<i>Model</i>	VF-7S	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	Outside diameter: 5.0 inches, length: 12.0 inches, carbon capacity: 7.0		
<i>Description</i>	pounds		

Equipment List for Permit to Operate 08699 - R5

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3 Flexible Hose

<i>Device ID #</i>	106882	<i>Device Name</i>	Flexible Hose
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	Inside diameter: 0.75 inches, length: 60 feet		
<i>Description</i>			

4 Desiccant Filter

<i>Device ID #</i>	106883	<i>Device Name</i>	Desiccant Filter
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	12 desiccant filter housings each 4 inches in diameter and 3 feet tall.		
<i>Description</i>			

5 Valves (Fugitive Components)

<i>Device ID #</i>	107154	<i>Device Name</i>	Valves (Fugitive Components)
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	Valves comprise of the following:		
<i>Description</i>	9 valves.		

Equipment List for Permit to Operate 08699 - R5

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6 Flanges (Fugitive Components)

<i>Device ID #</i>	<i>107155</i>	<i>Device Name</i>	Flanges (Fugitive Components)
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Connectors comprise of the following: 107 flanges and connectors.		



**PERMIT EVALUATION FOR
PERMIT TO OPERATE 08699 - R5**

Page 1 of 4

1.0 BACKGROUND

1.1 General: This PTO is the triennial reevaluation of the Permit to Operate and contains an updated review of APCD rules and emissions calculations. This odorant and metering station (O&M Station) was constructed in 1982. An additional odorant tank was installed in 1984.

1.2 Permit History:

PERMIT	FINAL ISSUED	PERMIT DESCRIPTION
Reeval 08699 R1	01/06/1992	See Permit
Reeval 08699 R2	09/15/1997	See Permit
ATC/PTO 10203	02/03/2000	See Permit
Reeval 08699 R3	12/05/2000	O&M Station and facility to load gas onto delivery trucks.
Reeval 08699 R4	01/18/2006	O&M Station and facility to load gas onto delivery trucks. This reevaluation removes the odorant filter, natural gas transfer station and associated fugitive components. These items were noted in the 2004 inspection report as being removed from the site.

1.3 Compliance History:

VIOLATION TYPE	NUMBER	ISSUE DATE	DESCRIPTION OF VIOLATION
NOV	5793	10/08/1999	Constructing/operating articles, machines or other equipment without obtaining an ATC.
NTC	7165	11/20/2001	Incomplete Annual Report.
NOV	7312	12/18/2001	Failing to adhere to the requirement to vent emissions from the odorizer through the carbon canister system.

2.0 ENGINEERING ANALYSIS

2.1 Equipment/Processes: The equipment subject to this permit emits reactive organic compounds (ROCs) as it analyzes, meters and odorizes natural gas from Platform Habitat. Emission sources

PERMIT EVALUATION FOR
PERMIT TO OPERATE 08699 - R5

Page 2 of 4

are from the equipment venting (e.g. bleeding off natural gas as it is sampled) and fugitive emissions from component leak paths. A metering pump injects odorant (tetrahydrathiophane) into the gas for safety purposes. The H₂S analyzer has set points of 3.0 ppm for alarm and 6.0 ppm for shutdown. Sampling for H₂S concentration is conducted with the YZ Industries gas sampler.

- 2.2 Emission Controls: Emission controls are utilized. The liquid level controller, the odorizer, the gas sampler and the H₂S analyzer are vented through an activated carbon canister. The odorant storage tank is filled by a tanker truck equipped with a closed-loop vapor recovery system.
- 2.3 Emission Factors: Emission factors used for fugitives are based on APCD P&P 6100.061.
- 2.4 Reasonable Worst Case Emission Scenario: Worst case emissions are based on operation of this facility 24 hours/day and 365 days/year.
- 2.5 Emission Calculations: Detailed emission calculation spreadsheets may be found in Attachment "A". These emissions define the Potential to Emit for the permitted equipment.
- 2.6 Special Calculations: Engineering calculations are used to determine the emissions due to bleed gas rates from the odorizer, gas sampler and liquid level controller.
- 2.7 BACT Analyses: Best Available Control Technology was not required for this project.
- 2.8 Enforceable Operational Limits: The permit has enforceable operating conditions that ensure the carbon control device is operated properly and that the carbon is replaced routinely.
- 2.9 Monitoring Requirements: Monitoring of the equipment's operational limits are required to ensure that these are enforceable. The monitoring requirements include monthly gas analyses and H₂S monitoring.
- 2.10 Recordkeeping and Reporting Requirements: The permit requires that the data which is monitored be recorded and reported to the APCD.
- 3.0 REEVALUATION REVIEW**
 - 3.1 Compliance Summary: Based on recent APCD inspection reports and annual report submittals, this facility is in compliance with APCD rules and permit conditions.
 - 3.2 Notes from Inspector: Since the previous permit reevaluation, the only facility inspection that occurred was conducted on June 27, 2005. The inspection report indicates that this facility was operating in compliance with APCD rules and regulations and the conditions of this permit at the time this inspection was conducted.
 - 3.3 Changes to Applicable Rules (or new rules): None.

PERMIT EVALUATION FOR
PERMIT TO OPERATE 08699 - R5

Page 3 of 4

3.4 Changes/Revisions to Engineering Analysis (EF updates, etc.): None.

3.5 Changes/Revisions to Monitoring, Recordkeeping & Reporting: None.

3.6 Other Changes/Corrections made: None.

4.0 REGULATORY REVIEW

4.1 Partial List of Applicable Rules: This project is anticipated to operate in compliance with the following rules:

Rule 201.	Permits Required
Rule 202.	Exemptions to Rule 201
Rule 301.	Circumvention
Rule 302.	Visible Emissions
Rule 303.	Nuisance
Rule 309	Specific Contaminants
Rule 310	Odorous Organic Sulfides
Rule 802.	Nonattainment Review
Rule 803	Prevention of Significant Deterioration

4.2 Rules Requiring Review: None

4.3 NEI Calculations: The net emission increase calculation is used to determine whether certain requirements must be applied to a project (e.g., offsets, AQIA, PSD BACT). The NEI values for the stationary source (the I, P1, P2 and D term of the NEI calculation) are documented in Attachment "B".

5.0 AQIA

The project is not subject to the Air Quality Impact Analysis requirements of Regulation VIII.

6.0 OFFSETS/ERCs

6.1 General: The emission offset thresholds of Regulation VIII are not exceeded.

6.2 Offsets: Offsets are not required for this permitting action.

6.3 ERCs: This source does not generate emission reduction credits.

7.0 AIR TOXICS

An air toxics health risk assessment was not performed for this permitting action.

PERMIT EVALUATION FOR
PERMIT TO OPERATE 08699 - R5

Page 4 of 4

8.0 CEQA / LEAD AGENCY

This project is exempt from CEQA pursuant to the Environmental Review Guidelines for the Santa Barbara County APCD (revised November 16, 2000). Appendix A.2 (*Equipment or Operations Exempt from CEQA*) specifically exempts Gas Utility Odorant and Metering Stations. No further action is necessary.

9.0 SCHOOL NOTIFICATION

A school notice pursuant to the requirements of H&SC §42301.6 was not required.

10.0 PUBLIC and AGENCY NOTIFICATION PROCESS/COMMENTS ON DRAFT PERMIT

This project was not subject to public notice. There were no comments on the draft permit.

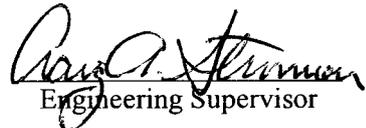
11.0 FEE DETERMINATION

Fees for the APCD's work efforts are assessed on a fee basis. The Project Code is 300800 (*SoCal Gas Facilities*). The detailed Fee Statement may be found in Attachment "C".

12.0 RECOMMENDATION

It is recommended that this permit be granted with the conditions as specified in the permit.

J. Menno March 2009
AQ Engineer Date

 March 2009
Engineering Supervisor Date

ATTACHMENTS

- A. Emission Calculations
- B. IDS Tables (facility/source)
- C. Fee Statement

ATTACHMENT "A"

Santa Barbara County APCD Fugitive ROC Emissions Calculation - CLP Method

ADMINISTRATIVE INFORMATION
 Attachment:
 Company: Social Gas
 Facility: Pita Point Odorant & Metering Station
 Processed by: JJM
 Date: 02/23/2009
 Path & File Name: \\sbcapcd.org\shares\Groups\ENGR\W\Oil&Gas\SoCalGas\Reevals\Reeval R5\8699-R5 FHC Calcs.xls\CMFUG

Facility Type: (Choose one facility type by marking the box to the right of the facility type with an "x")
 Production Field Gas Processing Plant Refinery Offshore Platform

Component:	Count	THC ¹ Emission Factor (lb/day-clip)	ROC/THC Ratio	Uncontrolled ROC Emission	Control Efficiency	Controlled ROC Emission	Controlled ROC Emission	Controlled ROC Emission
Gas Condensate Service	108	1.058	0.15	17.14	0.00	0.71	17.14	0.78
Valves - Accessible/Inaccessible		1.058	0.15	0.00	0.00	0.00	0.00	0.00
Valves - Unsafe		1.058	0.15	0.00	0.00	0.00	0.00	0.00
Valves - Bellows		1.058	0.15	0.00	0.00	0.00	0.00	0.00
Valves - Bellows / Background ppmv		1.058	0.15	0.00	0.00	0.00	0.00	0.00
Valves - Category A		1.058	0.15	0.00	0.00	0.00	0.00	0.00
Valves - Category B		1.058	0.15	0.00	0.00	0.00	0.00	0.00
Valves - Category C		1.058	0.15	0.00	0.00	0.00	0.00	0.00
Valves - Category D		1.058	0.15	0.00	0.00	0.00	0.00	0.00
Valves - Category E		1.058	0.15	0.00	0.00	0.00	0.00	0.00
Valves - Category F		1.058	0.15	0.00	0.00	0.00	0.00	0.00
Valves - Category G		1.058	0.15	0.00	0.00	0.00	0.00	0.00
Flanges/Connections - Accessible/Inaccessible	468	0.058	0.15	4.07	0.00	0.17	4.07	0.19
Flanges/Connections - Unsafe		0.058	0.15	0.00	0.00	0.00	0.00	0.00
Flanges/Connections - Category A		0.058	0.15	0.00	0.00	0.00	0.00	0.00
Flanges/Connections - Category B		0.058	0.15	0.00	0.00	0.00	0.00	0.00
Flanges/Connections - Category C		0.058	0.15	0.00	0.00	0.00	0.00	0.00
Flanges/Connections - Category D		0.058	0.15	0.00	0.00	0.00	0.00	0.00
Flanges/Connections - Category E		0.058	0.15	0.00	0.00	0.00	0.00	0.00
Flanges/Connections - Category F		0.058	0.15	0.00	0.00	0.00	0.00	0.00
Flanges/Connections - Category G		0.058	0.15	0.00	0.00	0.00	0.00	0.00
Compressor Seals - To Air		10.794	0.15	0.00	0.00	0.00	0.00	0.00
Compressor Seals - To VRS		10.794	0.15	0.00	0.00	0.00	0.00	0.00
PSV - To Air/Flare	4	9.947	0.15	5.97	0.00	0.25	5.97	0.27
PSV - To VRS		9.947	0.15	0.00	0.00	0.00	0.00	0.00
Pump Seals - Single		3.3	0.15	0.00	0.00	0.00	0.00	0.00
Pump Seals - Dual/Tandem		3.3	0.15	0.00	0.00	0.00	0.00	0.00
Total	580			27.18	0.00	1.132	27.18	1.240
								4.96

Notes:
 1 APCD P&P # 6100.061.1998.

Equipment	Bleed Rate scf/hr	Bleed Rate scf/yr	Mass Flow Rate lb/yr	Mass Flow Rate lb/day	ROC Emissions lb/day	ROC Emissions lb/yr	ROC Emissions tpy
Liquid level controller	4.2	36792	1777	4.87	0.73	267	0.133
Odorizer	4.2	36792	1777	4.87	0.73	267	0.133
Gas Sampler	0.018	158	7.6	0.021	0.003	1.1	0.0006
Total	8.42	73742	3562	9.76	1.46	534	0.27

Parameters Value Units Reference

Annual Operation 8760 hr/yr Reference

Specific Gravity of Gas 0.6 From gas analyses

Density of Air 1.29 g/L

Density of Air 0.0805 lb/scf

Density of gas (lb/scf) 0.0483 See Equation 1 below

ROC/THC ratio 0.15

Equations

1. Density of Gas = (Specific Gravity)*(Air Density)
2. Mass Flowrate = (Bleed Rate)*(Density of Gas)
3. ROC Emissions = (Mass Flowrate)*(ROC/THC ratio)

ATTACHMENT "B"

Potential to Emit (PTE)

	NO_x	ROC	CO	SO_x	PM	PM₁₀
lb/day	0.00	28.64	0.00	0.00	0.00	0.00
tons/year	0.00	5.23	0.00	0.00	0.00	0.00

Net Emissions Increase (NEI)

NEI Equation: $NEI = I + (P1 - P2) - D$

I = Potential to emit of the modification

P1 = All prior PTE increases requiring permits on or after November 15, 1990

P2 = All prior PTE decreases requiring permits on or after November 15, 1990

D = Pre-1990 baseline actual emission decreases

I =

	NO_x	ROC	CO	SO_x	PM	PM₁₀
lb/day	0.00	0.00	0.00	0.00	0.00	0.00
tons/year	0.00	0.00	0.00	0.00	0.00	0.00

From ATC/PTO 10203, issued February 4, 2000 for natural gas transfer station and fugitive components

P1 =

	NO_x	ROC	CO	SO_x	PM	PM₁₀
lb/day	0.00	2.36	0.00	0.00	0.00	0.00
tons/year	0.00	0.43	0.00	0.00	0.00	0.00

Removal of odorant filter, natural gas transfer station and fugitive components as documented in ATC/PTO 10203.

P2 =

	NO_x	ROC	CO	SO_x	PM	PM₁₀
lb/day	0.00	2.36	0.00	0.00	0.00	0.00
tons/year	0.00	0.43	0.00	0.00	0.00	0.00

D =

	NO_x	ROC	CO	SO_x	PM	PM₁₀
lb/day	0.00	0.00	0.00	0.00	0.00	0.00
tons/year	0.00	0.00	0.00	0.00	0.00	0.00

FNEI90/NEI =

	NO_x	ROC	CO	SO_x	PM	PM₁₀
lb/day	0.00	0.00	0.00	0.00	0.00	0.00
tons/year	0.00	0.00	0.00	0.00	0.00	0.00

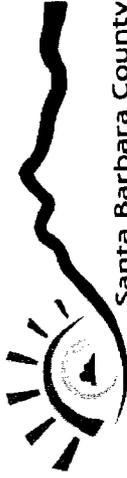
The facility net emission increase since November 15, 1990 (FNEI90) is equal to the NEI for this permit.

ATTACHMENT "C"

FEE STATEMENT

PTO No. 08699 - R5

FID: 02405 Pitas Point O & M / SSID: 02405



Santa Barbara County
Air Pollution Control District

Device Fee

Device No.	Device Name	Fee Schedule	Qty of Fee Units	Fee per Unit	Fee Units	Max or Min. Fee Apply?	Number of Same Devices	Pro Rate Factor	Device Fee	Penalty Fee?	Fee Credit	Total Fee per Device
106871	Odorant storage tank	A6	1.200	3.36	Per 1000 gallons	Min	1	1.000	58.28	0.00	0.00	58.28
106872	Liquid Level Controller	A1.a	1.000	58.66	Per equipment	No	1	1.000	58.66	0.00	0.00	58.66
106873	Odorizer	A1.a	1.000	58.66	Per equipment	No	1	1.000	58.66	0.00	0.00	58.66
106874	Gas Sampler	A1.a	1.000	58.66	Per equipment	No	1	1.000	58.66	0.00	0.00	58.66
106875	Hydrogen Sulfide Analyzer	A1.a	1.000	58.66	Per equipment	No	1	1.000	58.66	0.00	0.00	58.66
106876	Carbon Filter	A1.a	1.000	58.66	Per equipment	No	1	1.000	58.66	0.00	0.00	58.66
106877	Horizontal Separator	A1.a	1.000	58.66	Per equipment	No	1	1.000	58.66	0.00	0.00	58.66
106878	Underground Excess Liquid Storage Tank	A6	1.350	3.36	Per 1000 gallons	Min	1	1.000	58.28	0.00	0.00	58.28
									Device Fee Sub-Totals =	\$468.52	\$0.00	\$468.52
									Device Fee Total =	\$468.52	\$0.00	\$468.52

Permit Fee

Fee Based on Devices

468.52

Fee Statement Grand Total = \$468

Notes:

- (1) Fee Schedule Items are listed in APCD Rule 210, Fee Schedule "A".
- (2) The term "Units" refers to the unit of measure defined in the Fee Schedule.



**Santa Barbara County
Air Pollution Control District**

APR 19 2012

Certified Mail 7010 1060 0002 4633 8368
Return Receipt Requested

Mary Hale
Southern California Gas Company
PO Box 2300, ML 9314
Chatsworth, CA 91313-2300

FID: 02405
Permit: P 08699 - R6
SSID: 02405

Re: Permit to Operate 08699 - R6
Fee Due: \$ 491

Dear Ms. Hale:

Pursuant to Air Pollution Control District Rule 201, your permit to operate is reevaluated every three years. The Control Officer has completed that review and determined that the permit conditions of your existing Permit to Operate are adequate and therefore do not need to be updated. Please find the enclosed *Permit Reevaluation* which documents the triennial reevaluation of your Permit to Operate and requires you to:

- Pay a fee of \$ 491, which is due immediately and is late after 30 calendar days from the date stamped on the invoice. See the attached invoice and fee statement for more information.
- Keep a copy of the attached *Permit Reevaluation* document with your existing permit. Please be ready to make both documents readily available to a District Inspector upon request.
- Follow the conditions listed on your existing permit and the attached permit reevaluation. Pay careful attention to the recordkeeping and reporting requirements.

Please include the Facility Identification (FID) and the Permit number as shown above on all correspondence regarding this permit. If you have any questions, please contact Paula Iorio of my staff at (805) 961-8867.

Sincerely,

Michael F. Goldman, Manager
Engineering & Compliance Division

enc: Reeval 08699 - R6
Fee Statement
Invoice

cc: Reeval 08699 - R6 Project File, FID 02405
ECD Chron File
Paula Iorio (Cover letter only)
Accounting (Invoice only)



**Santa Barbara County
Air Pollution Control District**

260 N San Antonio Rd, Suite A
Santa Barbara, CA 93110-1315

Invoice: R 08699 - R6

Date: **APR 19 2012**

Terms: Net 30 Days

300800/6600/3282

INVOICE

BILL TO:

Mary Hale
Southern California Gas Company (001102)
PO Box 2300, ML 9314
Chatsworth, CA 91313-2300

FACILITY:

Pitas Point O & M
02405

Permit: Permit to Operate (PTO) No. 08699 - R6

Fee Type: Permit Reevaluation Fee (see the Fee Statement in your permit for a breakdown of the fees)

Amount Due: \$ 491

REMIT PAYMENTS TO THE ABOVE ADDRESS

Please indicate the invoice number R 08699 - R6
on your remittance.

IF YOU HAVE ANY QUESTIONS REGARDING YOUR INVOICE PLEASE CONTACT
OUR ADMINISTRATION DIVISION AT (805) 961-8800

The District charges \$25 for returned checks. Other penalties/fees may be incurred as a result of returned checks and late payment (see District Rule 210). Failure to pay this Invoice may result in the cancellation or suspension of your permit. Please notify the District regarding any changes to the above information

FEE STATEMENT

PTO No. 08699 - R6

FID: 02405 Pitas Point O & M / SSID: 02405



Santa Barbara County
Air Pollution Control District

Device Fee

Device No.	Device Name	Fee Schedule	Qty of Fee Units	Fee per Unit	Fee Units	Max or Min. Fee Apply?	Number of Same Devices	Pro Rate Factor	Device Fee	Penalty Fee?	Fee Credit	Total Fee per Device
106871	Odorant storage tank	A6	1.200	3.53	Per 1000 gallons	Min	1	1.000	61.17	0.00	0.00	61.17
106872	Liquid Level Controller	A1.a	1.000	61.57	Per equipment	No	1	1.000	61.57	0.00	0.00	61.57
106873	Odorizer	A1.a	1.000	61.57	Per equipment	No	1	1.000	61.57	0.00	0.00	61.57
106874	Gas Sampler	A1.a	1.000	61.57	Per equipment	No	1	1.000	61.57	0.00	0.00	61.57
106875	Hydrogen Sulfide Analyzer	A1.a	1.000	61.57	Per equipment	No	1	1.000	61.57	0.00	0.00	61.57
106876	Carbon Filter	A1.a	1.000	61.57	Per equipment	No	1	1.000	61.57	0.00	0.00	61.57
106877	Horizontal Separator	A1.a	1.000	61.57	Per equipment	No	1	1.000	61.57	0.00	0.00	61.57
106878	Underground Excess Liquid Storage Tank	A6	1.350	3.53	Per 1000 gallons	Min	1	1.000	61.17	0.00	0.00	61.17
									Device Fee Sub-Totals =	\$491.76	\$0.00	\$491.76
									Device Fee Total =			\$491.76

Permit Fee

Fee Based on Devices

491.76

Fee Statement Grand Total = \$491

Notes:

- (1) Fee Schedule Items are listed in District Rule 210, Fee Schedule "A".
- (2) The term "Units" refers to the unit of measure defined in the Fee Schedule.