



Ventura County  
Air Pollution  
Control District

## ANNUAL COMPLIANCE CERTIFICATION SIGNATURE COVER FORM

A copy of each Annual Compliance Certification shall be submitted to EPA, Region 9, at the following address:


Mr. Gerardo Rios, Chief  
Permits Office (AIR-3)  
Office of Air Division  
EPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

### Confidentiality

All information in a Part 70 permit compliance certification is public information. The Part 70 permit is also public information.

### Certification by Responsible Official

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this compliance certification are true, accurate, and complete.

Signature and Title of Responsible Official:  Title: <u>Vice President, West</u>	Date: <u>2/15/12</u>
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Time Period Covered by Compliance Certification <u>03 / 01 / 11</u> (MM/DD/YY) to <u>12 / 31 / 11</u> (MM/DD/YY)
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# Ventura County Air Pollution Control District

Company Name: Seneca Resources		Permit: 0990		
Certification Period: 03.01.11 through 12.31.11		Page 1 of 12		
COLUMN 1 Citation	COLUMN 2 Compliance Status (As indicated by most recent monitoring measurement or observation)	COLUMN 3 Determination Method: "CONTINUOUS" OR "INTERMITTENT"	COLUMN 4 Method for determining Compliance Status.	COLUMN 5 Additional Information (excursions, exceedences, or additional data that indicated non compliance during the certification period)
<b>Equipment/FACILITY WIDE REQUIREMENTS, Revised on 11/2009</b>				
40CFR61.M Cond 1	In Compliance	Continuous	Work Practices - Asbestos Activities	
40CFR61.M Cond 2	In Compliance	Continuous	Work Practices - Asbestos Activities	
40CFR68 Cond 1	In Compliance	Continuous	Reference Condition	
40CFR70 Cond 1	In Compliance	Continuous	Reference Condition	
40CFR70 Cond 2	In Compliance	Continuous	Reference Condition	
40CFR70 Cond 3	In Compliance	Continuous	Documentation of prompt reporting and followup deviation reports	
40CFR70 Cond 4	In Compliance	Continuous	Reference Condition	
40CFR70 Cond 5	In Compliance	Continuous	Documentation of Part 70 compliance records	
40CFR70 Cond 6	In Compliance	Continuous	Documentation of Part 70 permit records upon District request	
40CFR70 Cond 7	In Compliance	Continuous	Reference Condition	
40CFR70 Cond 8	In Compliance	Continuous	Reference Condition	
40CFR70 Cond 9	In Compliance	Continuous	Reference Condition	
40CFR70 Cond 10	In Compliance	Continuous	Reference Condition	
40CFR70 Cond 11	In Compliance	Continuous	Reference Condition	
40CFR70 Cond 12	In Compliance	Continuous	Reference Condition	
40CFR70 Cond 13	In Compliance	Continuous	Documentation of Title V five year renewal	



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40CFR70 Cond 14	In Compliance	Continuous	Documentation of Certification by Responsible Official	
40CFR70 Cond 15	In Compliance	Continuous	Documentation of Annual Certification submittals	
40CFR82 Cond 1	In Compliance	Continuous	Work Practices - Refrigerant/Air Conditioners	
40CFR82 Cond 2	In Compliance	Continuous	Work Practices - Refrigerant/Air Conditioners	
50 Cond 1	In Compliance	Continuous	Work Practices - Visible Emissions	
50 Cond 2	In Compliance	Continuous	Documentation of visible emissions	
50 Cond 3	In Compliance	Continuous	Documentation of visual emission evaluations and Annual Certification by Responsible Official	
50 Cond 4	In Compliance	Continuous	Documentation of visible emissions upon District request	
54.B.1 Cond 1	In Compliance	Continuous	Reference Condition	
54.B.1 Cond 2	In Compliance	Continuous	Reference Condition	
54.B.1 Cond 3	In Compliance	Continuous	Documentation of compliance upon District request	
54.B.2 Cond 1	In Compliance	Continuous	Documentation of fuel sulfur analysis and modeling data	
54.B.2 Cond 2	In Compliance	Continuous	Documentation of fuel sulfur analysis and modeling data	



# Ventura County Air Pollution Control District

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54.B.2 Cond 3	In Compliance	Continuous	Documentation of air modeling for ground level SO2 based on District request		
57.1 Cond 1	In Compliance	Continuous	Documentation of source test reports		
57.1 Cond 2	In Compliance	Continuous	Documentation of compliance upon District request		
57.1 Cond 3	In Compliance	Continuous	Reference Condition		
64.B.1 Cond 1	In Compliance	Continuous	Documentation of fuel sulfur analysis		
64.B.1 Cond 2	In Compliance	Continuous	Reference Condition		
64.B.1 Cond 3	In Compliance	Continuous	Documentation of fuel sulfur analysis		
64.B.1 Cond 4	In Compliance	Continuous	Documentation of fuel sulfur analysis and annual submittal		
71.1.C Cond 1	In Compliance	Continuous	Documentation of equipment configuration		
71.1.C Cond 2	In Compliance	Continuous	Reference Condition		
71.1.C Cond 3	In Compliance	Continuous	Annual visual inspection and certification that the vapor recovery system is a closed system		
71.1.C Cond 4	In Compliance	Continuous	Documentation of flare inspection records		
71.1.C Cond 5	In Compliance	Continuous	Documentation of 74.10 leak inspections		
71.4.B.1 Cond 1	In Compliance	Continuous	Work Practices - Pits, Ponds, and Well Cellars		



# Ventura County Air Pollution Control District

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71.4.B.1 Cond 2	In Compliance	Continuous	Documentation of Annual Certification by Responsible Official		
74.1 Cond 1	In Compliance	Continuous	Work Practices - Abrasive Blasting		
74.1 Cond 2	In Compliance	Continuous	Work Practices - Abrasive Blasting		
74.1 Cond 3	In Compliance	Continuous	Work Practices - Abrasive Blasting		
74.1 Cond 4	In Compliance	Continuous	Work Practices - Abrasive Blasting		
74.1 Cond 5	In Compliance	Continuous	Work Practices - Abrasive Blasting		
74.1 Cond 6	In Compliance	Continuous	Work Practices - Abrasive Blasting		
74.1 Cond 7	In Compliance	Continuous	Documentation of abrasive blasting operations & surveillance		
74.10 Cond 1	In Compliance	Continuous	Documentation of 74.10 Operator Management Plan		
74.10 Cond 2	In Compliance	Continuous	Work Practices - Tank Inspection		
74.10 Cond 3	In Compliance	Continuous	Reference Condition		
74.10 Cond 4	In Compliance	Continuous	Documentation of 74.10 Operator Management Plan		
74.10 Cond 5	In Compliance	Continuous	Documentation of 74.10 Operator Management Plan		
74.10 Cond 6	In Compliance	Continuous	Documentation of 74.10 Operator Management Plan		
74.10 Cond 7	In Compliance	Continuous	Documentation of 74.10 Operator Management Plan		



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74.10 Cond 8	In Compliance	Continuous	Documentation of 74.10 Operator Management Plan		
74.10 Cond 9	In Compliance	Continuous	Documentation of 74.10 Operator Management Plan		
74.10 Cond 10	In Compliance	Continuous	Documentation of 74.10 Operator Management Plan		
74.10 Cond 11	In Compliance	Continuous	Reference Condition		
74.10 Cond 12	In Compliance	Continuous	Reference Condition		
74.10 Cond 13	In Compliance	Continuous	Documentation of 74.10 Operator Management Plan		
74.10 Cond 14	In Compliance	Continuous	Reference Condition		
74.10 Cond 15	In Compliance	Continuous	Reference Condition		
74.10 Cond 16	In Compliance	Continuous	Reference Condition		
74.10 Cond 17	In Compliance	Continuous	Documentation of Operator Management Plan annual submittal/update		
74.10 Cond 18	In Compliance	Continuous	Documentation of 74.10 Operator Management Plan		
74.10 Cond 19	In Compliance	Continuous	Documentation of 74.10 Operator Management Plan		
74.10 Cond 20	In Compliance	Continuous	Documentation of 74.10 Operator Management Plan		
74.10 Cond 21	In Compliance	Continuous	Documentation of 74.10 inspection logs		



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<u>COLUMN 1</u> Citation	<u>COLUMN 2</u> Compliance Status (As indicated by most recent monitoring measurement or observation)	<u>COLUMN 3</u> Determination Method: "CONTINUOUS" OR "INTERMITTENT"	<u>COLUMN 4</u> Method for determining Compliance Status.	<u>COLUMN 5</u> Additional Information (excursions, exceedences, or additional data that indicated non compliance during the certification period)
74.10 Cond 22	In Compliance	Continuous	Documentation of 74.10 Operator Management Plan	
74.10 Cond 23	In Compliance	Continuous	Documentation of 74.10 Operator Management Plan	
74.10 Cond 24	In Compliance	Continuous	Documentation of 74.10 Operator Management Plan	
74.10 Cond 25	In Compliance	Continuous	Reference Condition	
74.10 Cond 26	In Compliance	Continuous	Reference Condition	
74.10 Cond 27	In Compliance	Continuous	Reference Condition	
74.10 Cond 28	In Compliance	Continuous	Reference Condition	
74.10 Cond 29	In Compliance	Continuous	Documentation of 74.10 inspection logs	
74.10 Cond 30	In Compliance	Continuous	Documentation of 74.10 inspection logs	
74.10 Cond 31	In Compliance	Continuous	Documentation of 74.10 inspection logs	
74.10 Cond 32	In Compliance	Continuous	Documentation of calibration records	
74.10 Cond 33	In Compliance	Continuous	Reference Condition	
74.10 Cond 34	In Compliance	Continuous	Reference Condition	
74.10 Cond 35	In Compliance	Continuous	Reference Condition	
74.10 Cond 36	In Compliance	Continuous	Reference Condition	
74.11.1 Cond 1	In Compliance	Continuous	Documentation of annual verification that no units exist	



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74.11.1 Cond 2	In Compliance	Continuous	Documentation of annual verification that no units exist	
74.11.1 Cond 3	In Compliance	Continuous	Documentation of manufacturers information	
74.11.1 Cond 4	In Compliance	Continuous	Documentation of annual verification that no units exist and Annual Certification by Responsible Official	
74.2 Cond 1	In Compliance	Continuous	Work Practices - Architectural Coatings	
74.2 Cond 2	In Compliance	Continuous	Work Practices - Architectural Coatings	
74.2 Cond 3	In Compliance	Continuous	Work Practices - Architectural Coatings	
74.2 Cond 4	In Compliance	Continuous	Work Practices - Architectural Coatings	
74.2 Cond 5	In Compliance	Continuous	Documentation of VOC content of architectural coatings	
74.2 Cond 6	In Compliance	Continuous	Reference Condition	
74.22 Cond 1	In Compliance	Continuous	Reference Condition	
74.22 Cond 2	In Compliance	Continuous	Documentation of compliance upon District request	
74.22 Cond 3	In Compliance	Continuous	Documentation of annual survey/verification and Annual Certification by Responsible Official	
74.4.D Cond 1	In Compliance	Continuous	Documentation of road oil constituents	





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74.4.D Cond 2	In Compliance	Continuous	Documentation of oil analysis records	
74.6 Cond 1	In Compliance	Continuous	Work Practices - Solvent Usage	
74.6 Cond 2	In Compliance	Continuous	Work Practices - Solvent Usage	
74.6 Cond 3	In Compliance	Continuous	Work Practices - Solvent Usage	
74.6 Cond 4	In Compliance	Continuous	Work Practices - Solvent Usage	
74.6 Cond 5	In Compliance	Continuous	Work Practices - Solvent Usage	
74.6 Cond 6	In Compliance	Continuous	Work Practices - Solvent Usage	
74.6 Cond 7	In Compliance	Continuous	Work Practices - Solvent Usage	
74.6 Cond 8	In Compliance	Continuous	Documentation of equipment configuration and operating parameters	
74.6 Cond 9	In Compliance	Continuous	Documentation of equipment configuration and operating parameters	
74.6 Cond 10	In Compliance	Continuous	Documentation of operating parameters	
74.6 Cond 11	In Compliance	Continuous	Reference Condition	
74.6 Cond 12	In Compliance	Continuous	Reference Condition	
74.6 Cond 13	In Compliance	Continuous	Reference Condition	
74.6 Cond 14	In Compliance	Continuous	Documentation of ROC containing solvent	
74.6 Cond 15	In Compliance	Continuous	Work Practices - Solvent Usage	



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General Cond 1	In Compliance	Continuous	Reference Condition	
<b>Equipment: 1 - 906 BHP Rich Burn Waukesha NG Engine (SN#17230) NSCR Revised on 8/1/2009</b>				
0990PC1 Cond 1	In Compliance	Continuous	Documentation of throughput records	
74.9N3 Cond 1	In Compliance	Continuous	Documentation of source test reports	
74.9N3 Cond 2	In Compliance	Continuous	Documentation of I.C. engine source test methods and submittal requirements	
74.9N3 Cond 3	In Compliance	Continuous	Documentation of quarterly engine screening analysis	
74.9N3 Cond 4	In Compliance	Continuous	Documentation of IC Engine Operator Inspection Plan	
74.9N3 Cond 5	In Compliance	Continuous	Documentation of I.C. engine inspection logs	
74.9N3 Cond 6	In Compliance	Continuous	Documentation of Annual Certification submittals	
74.9N3 Cond 7	In Compliance	Continuous	Documentation of Compliance Assurance Monitoring (CAM) test records and implementation of IC Engine Operator Inspection Plan	
<b>Equipment: 1 - 906 BHP Rich Burn Waukesha NG Engine (SN#192297) NSCR Revised on 8/1/2009</b>				
0990PC1 Cond 1	In Compliance	Continuous	Documentation of throughput records	
74.9N3 Cond 1	In Compliance	Continuous	Documentation of source test reports	
74.9N3 Cond 2	In Compliance	Continuous	Documentation of I.C. engine source test methods and submittal requirements	



# Ventura County Air Pollution Control District

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74.9N3 Cond 3	In Compliance	Continuous	Documentation of quarterly engine screening analysis	
74.9N3 Cond 4	In Compliance	Continuous	Documentation of IC Engine Operator Inspection Plan	
74.9N3 Cond 5	In Compliance	Continuous	Documentation of I.C. engine inspection logs	
74.9N3 Cond 6	In Compliance	Continuous	Documentation of Annual Certification submittals	
74.9N3 Cond 7	In Compliance	Continuous	Documentation of Compliance Assurance Monitoring (CAM) test records and implementation of IC Engine Operator Inspection Plan	
<b>Equipment: 1-262.5 MMBTU/Hr Macrotronic Waste Gas Flare, Revised on 1/1/2008</b>				
0990PC1 Cond 1	In Compliance	Continuous	Documentation of throughput records	
0990PC2 Cond 1	In Compliance	Continuous	Documentation of flare operating logs	
0990PC2 Cond 2	In Compliance	Continuous	Documentation of flare operating logs	
TP0990P Cond 1	In Compliance	Continuous	Documentation of fuel consumption records	
<b>Equipment: 1-105 BBL Condensate Tank (T-101) VR, Revised on 1/1/2008</b>				
0990PC1 Cond 1	In Compliance	Continuous	Documentation of throughput records	



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71.1N1 Cond 1	In Compliance	Continuous	Documentation of equipment configuration		
71.1N1 Cond 2	In Compliance	Continuous	Documentation of maintenance activities and APCD notifications		
71.1N1 Cond 3	In Compliance	Continuous	Documentation of 74.10 leak inspections and 74.10 Operator Management Plan		
71.1N1 Cond 4	In Compliance	Continuous	Documentation of vapor recovery component inspections and maintenance activities		
71.1N1 Cond 5	In Compliance	Continuous	Documentation of equipment configuration and Annual Certification by Responsible Official		
<b>Equipment 1: Glycol Dehydrator System consisting of:</b> 1 - Glycol Dehydrator VentVR 1 - 0.5 MMBTU/HR NG Glycol Refiller UNG Revised on 1/17/2008					
71.5N1 Cond 1	In Compliance	Continuous	Documentation of equipment configuration		
71.5N1 Cond 2	In Compliance	Continuous	Documentation of equipment configuration		
71.5N1 Cond 3	In Compliance	Continuous	Documentation of 74.10 Operator Management Plan		



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71.5N1 Cond 4	In Compliance	Continuous	Documentation of 74.10 leak inspections and 74.10 Operator Management Plan	
71.5N1 Cond 5	In Compliance	Continuous	Documentation of glycol unit records	
71.5N1 Cond 6	In Compliance	Continuous	Documentation of equipment configuration /leak inspections and Annual Certification by Responsible Official	
<b>Equipment: Solvent Wipe Cleaning, Revised on 11/2003</b>				
0990PC1 Cond 1	In Compliance	Continuous	Documentation of throughput records	



Ventura County  
Air Pollution  
Control District

# ANNUAL COMPLIANCE CERTIFICATION

## Section / SOURCE TEST SUMMARY FORM

Period Covered by Compliance Certification: 03 / 01 / 11 (MM/DD/YY) to 12 / 31 / 11 (MM/DD/YY)

A. Emission Unit Description: 906 BAR WAKESHA NY ENHINÉ (SN 17230) N5CR			B. Pollutant: NOx
C. Measured Emission Rate: 25 PPM	D. Limited Emission Rate: I.C.	E. Specific Source Test or Monitoring Record Citation: CONDITION 1	F. Test Date: MONDAY

A. Emission Unit Description: 906 BAR WAKESHA NY ENHINÉ (SN 17230) N5CR			B. Pollutant: CO
C. Measured Emission Rate: 4500 PPM	D. Limited Emission Rate: I.C.	E. Specific Source Test or Monitoring Record Citation: CONDITION 1	F. Test Date: MONDAY

A. Emission Unit Description: 906 BAR WAKESHA NY ENHINÉ (SN 192297) N5CR			B. Pollutant: NOx
C. Measured Emission Rate: 25 PPM	D. Limited Emission Rate: I.C.	E. Specific Source Test or Monitoring Record Citation: CONDITION 1	F. Test Date: MONDAY

A. Emission Unit Description: 906 BAR WAKESHA NY ENHINÉ (SN 192297) N5CR			B. Pollutant: CO
C. Measured Emission Rate: 4500 PPM	D. Limited Emission Rate: I.C.	E. Specific Source Test or Monitoring Record Citation: CONDITION 1	F. Test Date: MONDAY

A. Emission Unit Description:			B. Pollutant:
C. Measured Emission Rate:	D. Limited Emission Rate:	E. Specific Source Test or Monitoring Record Citation:	F. Test Date:

# SENECA RESOURCES

January 13, 2011

Mr. Lyle Olson  
Ventura County  
Air Pollution Control District  
669 County Square Drive  
Ventura, CA 93003

**SUBJECT: Part 70 Permit to Operate 00990 Semi-annual & Rule 74.9.F Reports**

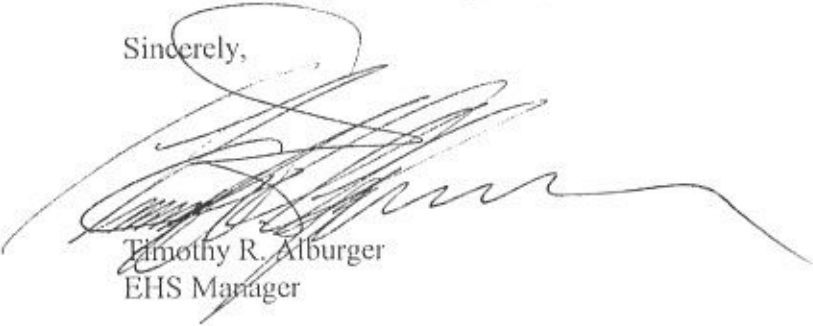
Dear Mr. Olson:

Enclosed is the 1.c.1 2011 Semi-annual Engine Report along with the Rule 74.9.F Annual Engine Report for the Sespe gas compressor engines.

In addition, with regard to 1.c.4, 40 CFR 61.145 did not apply during this reporting period.

If there are any questions regarding this matter, I may be reached at 661.399.4270, extension 3544.

Sincerely,



Timothy R. Alburger  
EHS Manager

Enclosures

Semi-annual Engine Report  
Annual Engine Report

SENECA RESOURCES

PTO 00990

Sespe Compressor Station

Rule 74.9.F: 2011 Annual Engine Report

A	B	C	D	E	1-qtr. (03)		2-qtr.		3-qtr.		4-qtr.		Qtrs. Averaged	
					NO <sub>x</sub>	CO	NO <sub>x</sub>	CO	NO <sub>x</sub>	CO	NO <sub>x</sub>	CO	NO <sub>x</sub>	CO
Waukesha	VHP	ICE A	Sespe	10.90	-	-	1.7	135.0	1.3	43.0	1.9	111.5	1.2	72.4
Waukesha	VHP	ICE B	Sespe	10.02	2.2	889.0	14.3	230.6	1.5	96.5	1.4	85.5	4.8	325.4

A: manufacturer

B: model number

C: operator identification

D: location

E: fuel consumption in MMcf

CAM excursions: none

All values stated in ppm, corrected to 15% O<sub>2</sub>.

Permitted limits: NO<sub>x</sub> 25, CO 4500

- means that the engine was shutdown.

Summary of Maintenance

A quarterly service for an engine includes, but is not necessarily limited to, the following: (i) change engine oil and replace filters, (ii) replace spark plugs, (iii) replace air filters, (iv) replace catalytic converter O<sub>2</sub> sensors, (v) check timing and adjust if necessary, and (vi) check belts and hoses. During the second quarter, the engines' exhausts were insulated to increase catalytic converter efficiency. On July 26, 2011, ICE B's single-can element was removed and replaced with a X-90 Johnson Matthey element. Furthermore, Doug Rogers, with Seneca Resources, screen tests each engine's emissions, makes requisite adjustments to the air-fuel ratio control system, and adjusts and services the catalytic converter control system.