



OCT 09 2014

Ms. Jennifer Hart
Vintage Production California
9600 Ming Ave, Suite 300
Bakersfield, CA 93311

Re: Notice of Minor Title V Permit Modification
District Facility # S-1737
Project # S-1143632

Dear Ms. Hart:

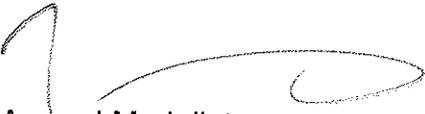
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to modify Permit(s) to Operate (PTOs) S-1737-168-12 and -198-0 of the facility's current Title V operating permit. The modification is for the installation of a fixed roof 500 bbl clarifier tank. The new tank will be connected to an existing vapor control system listed on PTO S-1737-168.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V PTOs, application, and previous Title V permit. This project will be finalized after the 45-day EPA comment period.

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,


Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1143632

Engineer: G. Heinen
Date: September 29, 2014

Facility Number: S-1737
Facility Name: Vintage Production California, LLC.
Mailing Address: 9600 Ming Ave, Suite 300
Bakersfield, CA 93311

Contact Name: Jennifer Hart
Phone: 661-869-8065

Responsible Official: John Ocana
Title: Operations Manager

I. PROPOSAL

Vintage Production California, LLC is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct (ATC permits, S-1737-168-12 and S-1737-198-0, into the Title V operating permit. The modification is for the installation of a fixed roof 500 bbl clarifier tank. The new tank will be connected to an existing vapor control system listed on PTO S-1737-168.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

The equipment will be located at the VPC Rose facility, within the SE/4 of Section 36, Township 26S, Range 24E in Vintage's Light Oil Central stationary source. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

III. EQUIPMENT DESCRIPTION

S-1737-168-16: 126,000 GALLON FIXED ROOF CRUDE OIL GAUGE STORAGE TANK, 3-PHASE SEPARATOR, TWO HEATER TREATERS (EACH WITH BURNERS RATED AT 5 MMBTU/HR OR LESS), TWO 2-PHASE SEPARATORS SERVED BY VAPOR RECOVERY SYSTEM SHARED WITH TANKS S-1737-169, '-170, '-171, AND '-198. VAPOR RECOVERY SYSTEM CONSISTS OF COMPRESSOR AND ASSOCIATED PIPING DISCHARGING TO FLARE S-1737-180-0 AND/OR SALES GAS LINE

S-1737-198-1: 500 BBL FIXED ROOF CLARIFIER TANK VENTED TO VAPOR CONTROL SYSTEM LISTED ON TANK S-1737-168

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Vintage Production California, LLC is proposing to install a fixed roof 500 bbl clarifier tank. The new tank will be connected to an existing vapor control system listed on PTO S-1737-168.

S-1737-168-12:

The Equipment Description was amended to add permit unit -198 to the list of tanks controlled by the shared vapor recovery system. No changes were made to the permit conditions.

Permit Condition #1 was included in ATC S-1737-168-12 to ensure an application was submitted to modify the Title V permit to incorporate that ATC. The application for this project satisfies that condition so it will be removed from the final permit.

S-1737-198-1:

Permit Condition #1 was included in ATC S-1737-198-0 to ensure an application was submitted to modify the Title V permit to incorporate that ATC. The application for this project satisfies that condition so it will be removed from the final permit.

Permit Condition #32 was included in ATC S-1737-198-0 to ensure the tank ATC was implemented concurrently with the emission control system modification ATC. The application for this project satisfies that condition so it will be removed from the final permit.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit Nos. S-1737-168-16 and S-1737-198-1
- B. Authorities to Construct Nos. S-1737-168-12- and S-1737-198-0
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit No. S-1737-168-7

ATTACHMENT A

Proposed Modified Title V Operating Permit
Nos.
S-1737-168-16 and S-1737-198-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1737-168-16

EXPIRATION DATE: 02/28/2018

SECTION: SE36 TOWNSHIP: 26S RANGE: 24E

EQUIPMENT DESCRIPTION:

126,000 GALLON FIXED ROOF CRUDE OIL GAUGE STORAGE TANK, 3-PHASE SEPARATOR, TWO HEATER TREATERS (EACH WITH BURNER(S) RATED AT 5 MMBTU/HR OR LESS), TWO 2-PHASE SEPARATORS SERVED BY VAPOR RECOVERY SYSTEM SHARED WITH TANKS S-1737-169, '-170, '-171, AND '-198. VAPOR RECOVERY SYSTEM CONSISTS OF COMPRESSOR AND ASSOCIATED PIPING DISCHARGING TO FLARE S-1737-180-0 AND/OR SALES GAS LINE

PERMIT UNIT REQUIREMENTS

1. Gases from the tanks, heater treaters, and all separators shall be flared or routed to a sales pipeline. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The API gravity of any organic liquid stored or processed in this tank shall be less than 30ø. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
3. Fugitive VOC emissions from all components associated with this tank shall not exceed 0.14 lb/day as calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c, Oil and Gas Production Screening Value Ranges Emission Factors (Feb 1999). [District Rule 2201] Federally Enforceable Through Title V Permit
4. The storage tank shall be fully enclosed and shall be maintained in a leak-free condition. The storage tank shall be connected to an APCO-approved vapor recovery system consisting of a closed system that collects all VOCs from the storage tank(s) and a VOC control device. The vapor recovery system shall be maintained in leak-free condition. Collected vapor shall be directed to a gas pipeline distribution system or to an approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in Section 6.4.6 of District Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. Fugitive VOC emissions from all components associated with the vapor recovery system (shared with S-1737-169, '-170, and '-171) including vapor collection piping, vapor compressor, heater treaters, flare gas line, separator vessels and scrubbers shall not exceed 0.98 lb/day as calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c, Oil and Gas Production Screening Value Ranges Emission Factors (Feb 1999). [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

9. Permittee shall maintain accurate fugitive component count and resultant emissions calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c, Oil and Gas Production Screening Value Ranges Emission Factors (Feb 1999). These records shall be retained on-site for a period of at least five years, and shall be made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Heater treaters shall only be fired on PUC-quality natural gas or LPG. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The permittee shall tune the unit (two heaters) at least twice per calendar year, (from four to eight months apart) using a qualified technician in accordance with the procedure described in Rule 4304. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for a calendar year. No tune-up is required if the unit is not operated during that calendar year; and this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is complete the unit shall be shutdown. [District Rule 4307] Federally Enforceable Through Title V Permit
12. The permittee shall keep accurate records of each organic liquid stored in the tank, including its type and API gravity. [District Rules 1070, 2201 and 4409] Federally Enforceable Through Title V Permit
13. On and after July 1, 2015, the heater treaters in this unit shall comply with the applicable emission requirements of Section 5.1, Table 1 in District Rule 4307. [District Rule 4307] Federally Enforceable Through Title V Permit
14. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 4623] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

DRAFT

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1737-198-1

EXPIRATION DATE: 02/28/2018

SECTION: SE/36 **TOWNSHIP:** 26S **RANGE:** 24E

EQUIPMENT DESCRIPTION:

500 BBL FIXED ROOF CLARIFIER TANK VENTED TO VAPOR CONTROL SYSTEM LISTED ON TANK S-1737-168

PERMIT UNIT REQUIREMENTS

1. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in gas-tight condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6. [District Rule 4623] Federally Enforceable Through Title V Permit
2. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit
3. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
4. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit
5. VOC fugitive emissions from the components in gas/light oil service on tank and from tank to vapor control, system trunk line shall not exceed 0.10 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Permittee shall maintain accurate component count for tank according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
8. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. Any component found to be leaking by the operator on two consecutive annual inspections is in violation of District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
11. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
12. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
13. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
14. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
15. If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
16. Permittee shall notify the APCO in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rules 4623 and 2080] Federally Enforceable Through Title V Permit
17. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rules 4623 and 2080] Federally Enforceable Through Title V Permit
18. This tank shall be degassed before commencing interior cleaning by 1) exhausting VOCs contained in the tank vapor space to an APCO-approved vapor recovery system until the organic vapor concentration is 5,000 ppmv or less, or is 10 percent or less of the lower explosion limit (LEL), whichever is less 2) by filling the tank with a suitable liquid until 90 percent or more of the maximum operating level of the tank is filled. Suitable liquids are organic liquids having a TVP of less than 0.5 psia, water, clean produced water, or produced water derived from crude oil having a TVP less than 0.5 psia. or 3) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable gas. Degassing shall continue until the operator has achieved a vapor displacement equivalent to at least 2.3 times the tank capacity. Suitable gases are air, nitrogen, carbon dioxide, or natural gas containing less than 10 percent VOC by weight. [District Rule 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

19. During tank degassing, the operator shall discharge or displace organic vapors contained in the tank vapor space to an APCO-approved vapor recovery system. [District Rule 4623] Federally Enforceable Through Title V Permit
20. To facilitate connection to an external APCO-approved recovery system, a suitable tank fitting, such as a manway, may be temporarily removed for a period of time not to exceed 1 hour. [District Rules 4623] Federally Enforceable Through Title V Permit
21. This tank shall be in compliance with the applicable requirements of District Rule 4623 at all times during draining, degassing, and refilling the tank with an organic liquid having a TVP of 0.5 psia or greater. [District Rule 4623] Federally Enforceable Through Title V Permit
22. After a tank has been degassed pursuant to the requirements of this permit, vapor control requirements are not applicable until an organic liquid having a TVP of 0.5 psia or greater is placed, held, or stored in this tank. [District Rule 4623] Federally Enforceable Through Title V Permit
23. While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 degrees F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 4623] Federally Enforceable Through Title V Permit
24. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 4623] Federally Enforceable Through Title V Permit
25. During sludge removal, the operator shall control emissions from the sludge receiving vessel by operating an APCO-approved vapor control device that reduces emissions of organic vapors by at least 95%. [District Rule 4623] Federally Enforceable Through Title V Permit
26. Permittee shall only transport removed sludge in closed, liquid leak-free containers. [District Rule 4623] Federally Enforceable Through Title V Permit
27. Permittee shall store removed sludge, until final disposal, in vapor leak-free containers, or in tanks complying with the vapor control requirements of District Rule 4623. Sludge that is to be used to manufacture roadmix, as defined in District Rule 2020, is not required to be stored in this manner. Roadmix manufacturing operations exempt pursuant to District Rule 2020 shall maintain documentation of their compliance with Rule 2020, and shall readily make said documentation available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit
28. Permittee shall keep accurate records of the dates of inspection and monitoring and the components inspected and monitored. [District Rule 2201] Federally Enforceable Through Title V Permit
29. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
30. Permittee shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

DRAFT

ATTACHMENT B

Authority to Construct Nos.
S-1737-168-12- and S-1737-198-0

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1737-168-12

ISSUANCE DATE: 08/25/2014

LEGAL OWNER OR OPERATOR: VINTAGE PRODUCTION CALIFORNIA LLC

MAILING ADDRESS: 9600 MING AVE, SUITE 300
BAKERSFIELD, CA 93311

LOCATION: LIGHT OIL CENTRAL
KERN COUNTY, CA

SECTION: SE36 TOWNSHIP: 26S RANGE: 24E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 126,000 GALLON FIXED ROOF CRUDE OIL GAUGE STORAGE TANK, 3-PHASE SEPARATOR, TWO HEATER TREATERS (EACH WITH BURNER(S) RATED AT 5 MMBTU/HR OR LESS), TWO 2-PHASE SEPARATORS SERVED BY VAPOR RECOVERY SYSTEM SHARED WITH TANKS S-1737-169, '-170, AND '-171. VAPOR RECOVERY SYSTEM CONSISTS OF COMPRESSOR AND ASSOCIATED PIPING DISCHARGING TO FLARE S-1737-180-0 AND/OR SALES GAS LINE: CONNECT TANK S-1737-198 TO VAPOR CONTROL SYSTEM

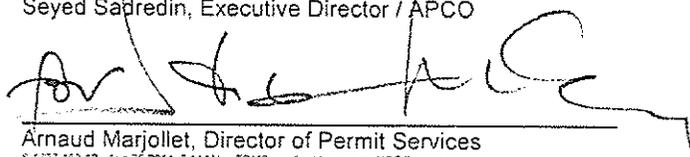
CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Gases from the tanks, heater treaters, and all separators shall be flared or routed to a sales pipeline. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The API gravity of any organic liquid stored or processed in this tank shall be less than 30 ϕ . [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
4. Fugitive VOC emissions from all components associated with this tank shall not exceed 0.14 lb/day as calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c, Oil and Gas Production Screening Value Ranges Emission Factors (Feb 1999). [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


Arnaud Marjollet, Director of Permit Services

S-1737-168-12 Aug 25 2014 7:11AM - TOVS Job Inspection NOT Required

5. The storage tank shall be fully enclosed and shall be maintained in a leak-free condition. The storage tank shall be connected to an APCO-approved vapor recovery system consisting of a closed system that collects all VOCs from the storage tank(s) and a VOC control device. The vapor recovery system shall be maintained in leak-free condition. Collected vapor shall be directed to a gas pipeline distribution system or to an approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in Section 6.4.6 of District Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. Fugitive VOC emissions from all components associated with the vapor recovery system (shared with S-1737-169, '-170, and '-171) including vapor collection piping, vapor compressor, heater treaters, flare gas line, separator vessels and scrubbers shall not exceed 0.98 lb/day as calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c, Oil and Gas Production Screening Value Ranges Emission Factors (Feb 1999). [District Rule 2201] Federally Enforceable Through Title V Permit
10. Permittee shall maintain accurate fugitive component count and resultant emissions calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c, Oil and Gas Production Screening Value Ranges Emission Factors (Feb 1999). These records shall be retained on-site for a period of at least five years, and shall be made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Heater treaters shall only be fired on PUC-quality natural gas or LPG. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The permittee shall tune the unit (two heaters) at least twice per calendar year, (from four to eight months apart) using a qualified technician in accordance with the procedure described in Rule 4304. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for a calendar year. No tune-up is required if the unit is not operated during that calendar year; and this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is complete the unit shall be shutdown. [District Rule 4307] Federally Enforceable Through Title V Permit
13. The permittee shall keep accurate records of each organic liquid stored in the tank, including its type and API gravity. [District Rules 1070, 2201 and 4409] Federally Enforceable Through Title V Permit
14. On and after July 1, 2015, the heater treaters in this unit shall comply with the applicable emission requirements of Section 5.1, Table I in District Rule 4307. [District Rule 4307] Federally Enforceable Through Title V Permit
15. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 4623] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: S-1737-198-0

ISSUANCE DATE: 08/25/2014

LEGAL OWNER OR OPERATOR: VINTAGE PRODUCTION CALIFORNIA LLC

MAILING ADDRESS: 9600 MING AVE, SUITE 300
BAKERSFIELD, CA 93311

LOCATION: LIGHT OIL CENTRAL
KERN COUNTY, CA

SECTION: SE/36 TOWNSHIP: 26S RANGE: 24E

EQUIPMENT DESCRIPTION:

500 BBL FIXED ROOF CLARIFIER TANK SERVED BY VAPOR RECOVERY SYSTEM SHARED WITH S-1737-168

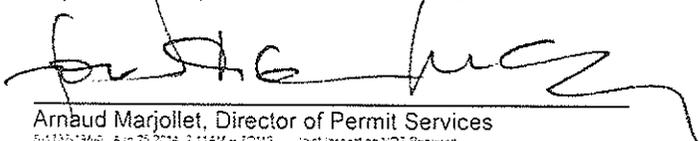
CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in gas-tight condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6. [District Rule 4623]
3. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623]
4. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623]
5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623]
6. VOC fugitive emissions from the components in gas/light oil service on tank and from tank to vapor control, system trunk line shall not exceed 0.10 lb/day. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO



Arnaud Marjolet, Director of Permit Services

S-1737-198-0 Aug 25 2014 9:11AM - JCMG last inspected on NOT Required

7. Permittee shall maintain accurate component count for tank according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]
8. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201]
9. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623]
10. Any component found to be leaking by the operator on two consecutive annual inspections is in violation of District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623]
11. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 2201 and 4623]
12. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rules 2201 and 4623]
13. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rules 2201 and 4623]
14. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 and 4623]
15. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rules 2201 and 4623]
16. If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rules 2201 and 4623]
17. Permittee shall notify the APCO in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rules 4623 and 2080]
18. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rules 4623 and 2080]

CONDITIONS CONTINUE ON NEXT PAGE

19. This tank shall be degassed before commencing interior cleaning by 1) exhausting VOCs contained in the tank vapor space to an APCO-approved vapor recovery system until the organic vapor concentration is 5,000 ppmv or less, or is 10 percent or less of the lower explosion limit (LEL), whichever is less 2) by filling the tank with a suitable liquid until 90 percent or more of the maximum operating level of the tank is filled. Suitable liquids are organic liquids having a TVP of less than 0.5 psia, water, clean produced water, or produced water derived from crude oil having a TVP less than 0.5 psia. or 3) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable gas. Degassing shall continue until the operator has achieved a vapor displacement equivalent to at least 2.3 times the tank capacity. Suitable gases are air, nitrogen, carbon dioxide, or natural gas containing less than 10 percent VOC by weight. [District Rule 4623]
20. During tank degassing, the operator shall discharge or displace organic vapors contained in the tank vapor space to an APCO-approved vapor recovery system. [District Rule 4623]
21. To facilitate connection to an external APCO-approved recovery system, a suitable tank fitting, such as a manway, may be temporarily removed for a period of time not to exceed 1 hour. [District Rules 4623]
22. This tank shall be in compliance with the applicable requirements of District Rule 4623 at all times during draining, degassing, and refilling the tank with an organic liquid having a TVP of 0.5 psia or greater. [District Rule 4623]
23. After a tank has been degassed pursuant to the requirements of this permit, vapor control requirements are not applicable until an organic liquid having a TVP of 0.5 psia or greater is placed, held, or stored in this tank. [District Rule 4623]
24. While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 degrees F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 4623]
25. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 4623]
26. During sludge removal, the operator shall control emissions from the sludge receiving vessel by operating an APCO-approved vapor control device that reduces emissions of organic vapors by at least 95%. [District Rule 4623]
27. Permittee shall only transport removed sludge in closed, liquid leak-free containers. [District Rule 4623]
28. Permittee shall store removed sludge, until final disposal, in vapor leak-free containers, or in tanks complying with the vapor control requirements of District Rule 4623. Sludge that is to be used to manufacture roadmix, as defined in District Rule 2020, is not required to be stored in this manner. Roadmix manufacturing operations exempt pursuant to District Rule 2020 shall maintain documentation of their compliance with Rule 2020, and shall readily make said documentation available for District inspection upon request. [District Rule 4623]
29. Permittee shall keep accurate records of the dates of inspection and monitoring and the components inspected and monitored. [District Rule 2201]
30. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rules 2201 and 4623]
31. Permittee shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2201 and 4623]
32. Authority to Construct (ATC) permit S-1737-168-12 shall be implemented concurrently with this ATC permit. [District Rule 2201]

ATTACHMENT C

Emissions Increases

From the original ATC project S-1143340, the project increases were calculated only for the two affected permit units and are shown in the table below. The emissions from S-1737-198-1 reflect the fugitive emissions from the tank. Non-fugitive emissions are routed through the shared vapor control system of PTO S-1737-168-7.

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
S-1737-168-16	0	0	0	0	0
S-1737-198-1	0	37*	0	0	0
SSIPE	0	37*	0	0	0

* Per the District's draft policy "*Implementation of Rule 2201 (as amended on 12/18/08 and effective on 6/10/10) for SB288 and Federal Major Modifications*", if the emission increases are less than or equal to 0.5 lb/day, on an average basis, then they are to be rounded to zero (consistent with District Policy APR-1130 Increases in Maximum Daily Permitted Emissions of Less than or Equal to 0.5 lb/day.)

ATTACHMENT D

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

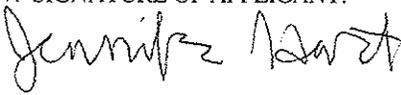
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SEP 02 2014

Permit Application For:

[] ADMINISTRATIVE AMENDMENT [X] MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

Permits Services
SJVAPCD

1. PERMIT TO BE ISSUED TO: Vintage Production California LLC (VPC)	
2. MAILING ADDRESS:	
STREET/P.O. BOX: 9600 Ming Avenue, Suite 300	
CITY: Bakersfield STATE: CA	9-DIGIT ZIP CODE: 93311
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:	INSTALLATION DATE:
STREET: _____ CITY: Light Oil Central Source (S-1737)	
SE ¼ SECTION 36 TOWNSHIP 26S RANGE 24E	
4. GENERAL NATURE OF BUSINESS: Crude Oil and Natural Gas Production	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)	
Incorporate ATCs S-1737-168-12 and S-1737-198-0 into Title V permit S-1737 – Vintage Production California LLC, Light Oil Central stationary source.	
6. TYPE OR PRINT NAME OF APPLICANT: Jennifer Hart – Vintage Production California LLC	TITLE OF APPLICANT: HES Advisor
7. SIGNATURE OF APPLICANT: 	DATE: 8/28/14
	PHONE: (661) 869-8065
	FAX: (661) 869-8170
	EMAIL: Jennifer_hart@oxy.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____ DATE PAID: _____ PROJECT NO: S-1143632 FACILITY ID: S-1737
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**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

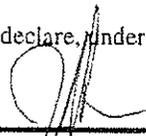
- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: Vintage Production California LLC	FACILITY ID: S -1737
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Vintage Production California LLC	
3. Agent to the Owner: Jennifer Hart	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:



Signature of Responsible Official

09/23/2014

Date

John Ocana

Name of Responsible Official (please print)

Operations Manager, Central Valley Operations

Title of Responsible Official (please print)

ATTACHMENT E

Previous Title V Operating Permit No.
S-1737-168-7

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1737-168-7

EXPIRATION DATE: 02/28/2018

SECTION: SE36 **TOWNSHIP:** 26S **RANGE:** 24E

EQUIPMENT DESCRIPTION:

126,000 GALLON FIXED ROOF CRUDE OIL GAUGE STORAGE TANK, 3-PHASE SEPARATOR, TWO HEATER TREATERS (EACH WITH BURNER(S) RATED AT 5 MMBTU/HR OR LESS), TWO 2-PHASE SEPARATORS SERVED BY VAPOR RECOVERY SYSTEM SHARED WITH TANKS S-1737-169, '-170, AND '-171. VAPOR RECOVERY SYSTEM CONSISTS OF COMPRESSOR AND ASSOCIATED PIPING DISCHARGING TO FLARE S-1737-180-0 AND/OR SALES GAS LINE

PERMIT UNIT REQUIREMENTS

1. Gases from the tanks, heater treaters, and all separators shall be flared or routed to a sales pipeline. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The API gravity of any organic liquid stored or processed in this tank shall be less than 30ø. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
3. Fugitive VOC emissions from all components associated with this tank shall not exceed 0.14 lb/day as calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c, Oil and Gas Production Screening Value Ranges Emission Factors (Feb 1999). [District Rule 2201] Federally Enforceable Through Title V Permit
4. The storage tank shall be fully enclosed and shall be maintained in a leak-free condition. The storage tank shall be connected to an APCO-approved vapor recovery system consisting of a closed system that collects all VOCs from the storage tank(s) and a VOC control device. The vapor recovery system shall be maintained in leak-free condition. Collected vapor shall be directed to a gas pipeline distribution system or to an approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in Section 6.4.6 of District Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. Fugitive VOC emissions from all components associated with the vapor recovery system (shared with S-1737-169, '-170, and '-171) including vapor collection piping, vapor compressor, heater treaters, flare gas line, separator vessels and scrubbers shall not exceed 0.98 lb/day as calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c, Oil and Gas Production Screening Value Ranges Emission Factors (Feb 1999). [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: VINTAGE PRODUCTION CALIFORNIA LLC

Location: LIGHT OIL CENTRAL, KERN COUNTY, CA

S-1737-168-7 : Sep 29 2014 9:29AM -- HEINENG

9. Permittee shall maintain accurate fugitive component count and resultant emissions calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c, Oil and Gas Production Screening Value Ranges Emission Factors (Feb 1999). These records shall be retained on-site for a period of at least five years, and shall be made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Heater treaters shall only be fired on PUC-quality natural gas or LPG. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The permittee shall tune the unit (two heaters) at least twice per calendar year, (from four to eight months apart) using a qualified technician in accordance with the procedure described in Rule 4304. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for a calendar year. No tune-up is required if the unit is not operated during that calendar year; and this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is complete the unit shall be shutdown. [District Rule 4307] Federally Enforceable Through Title V Permit
12. The permittee shall keep accurate records of each organic liquid stored in the tank, including its type and API gravity. [District Rules 1070, 2201 and 4409] Federally Enforceable Through Title V Permit
13. On and after July 1, 2015, the heater treaters in this unit shall comply with the applicable emission requirements of Section 5.1, Table 1 in District Rule 4307. [District Rule 4307] Federally Enforceable Through Title V Permit
14. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 4623] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.