



FEB 14 2013

Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

Re: **Proposed Authorities to Construct / Certificate of Conformity (Minor Mod)**
District Facility # S-2234
Project # 1124365

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authorities to Construct for Occidental of Elk Hills Inc, located at the gas plant stationary source, which has been issued a Title V permit. Occidental of Elk Hills Inc is requesting that a Certificate of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. The project authorizes glycol, amine and slop oil tanks each equipped with vapor control.

Enclosed is the engineering evaluation of this application, a copy of the current Title V permit, and proposed Authorities to Construct # S-2234-233-1, '-234-1, and '-239-1 with Certificate of Conformity. After demonstrating compliance with the Authorities to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter. If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,



David Warner
Director of Permit Services

Enclosures
cc: Richard Edgehill, Permit Services

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
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FEB 14 2013

Dennis Champion
Occidental of Elk Hills Inc
10800 Stockdale Highway
Bakersfield, CA 93311

**Re: Proposed Authorities to Construct / Certificate of Conformity (Minor Mod)
District Facility # S-2234
Project # 1124365**

Dear Mr. Champion:

Enclosed for your review is the District's analysis of your application for Authorities to Construct for the facility identified above. You have requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The project authorizes glycol, amine and slop oil tanks each equipped with vapor control.

After addressing any EPA comments made during the 45-day comment period, the Authorities to Construct will be issued to the facility with a Certificate of Conformity. Prior to operating with modifications authorized by the Authorities to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,



David Warner
Director of Permit Services

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San Joaquin Valley Air Pollution Control District
Authority to Construct Application Review
Reauthorization of three (3) tanks in cryogenic gas plant

Facility Name: Occidental of Elk Hills Inc
Mailing Address: 10800 Stockdale Highway
Bakersfield, CA 93311
Contact Person: Dennis Champion
Telephone: (661) 412-5214
Fax: (661) 412-5270
E-Mail: Raymond_rodriguez@oxy.com
Application #(s): S-2234-233-1, '-234-1, and '-239-1
Project #: 1124365
Deemed Complete: December 26, 2012

Date: February 4, 2013
Engineer: Richard Edgehill
Lead Engineer: Steve Leonard



I. Proposal

Occidental of Elk Hills Inc (OEHI) has requested Authorities to Construct (ATCs) for the reauthorization of three (3) fixed-roof tanks previously approved for project S-2234, 1103628 (ATCs S-2234-233-0, '-234-0, and '-239-0) which authorized a cryogenic natural gas processing facility. ATCs S-2234-233-0, '-234-0, and '-239-0 will be cancelled and replaced by ATCs authorizing vapor controlled tanks.

The project results in a small increase in fugitive emissions. Offsets, BACT, and public notice are not required.

OEHI S-2234 has a Title V Permit. This modification can be classified as a Title V minor modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. OEHI must apply to administratively amend their Title V permit.

II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (4/21/11)
Rule 2410	Prevention of Significant Deterioration (6/16/11)
Rule 2520	Federally Mandated Operating Permits (6/21/01)
Rule 4001	New Source Performance Standards (4/14/99)

40 CFR Part 60, Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 – **not applicable** - capacity of

the new tanks are $\leq 420,000$ gallons, and crude oil is stored prior to custody transfer; therefore, this subpart does not apply to the tanks in this project.

40 CFR Part 60, **Subpart KKK**—Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants

Rule 4002 National Emissions Standards for Hazardous Air Pollutants (5/20/04) –
exempt – facility is not a major HAPs source
Rule 4102 Nuisance (12/17/92)
Rule 4409 Components at Light Crude Oil Production Facilities, Natural Gas
Production Facilities, and Natural Gas Processing Facilities (4/30/05)
Rule 4623 Storage of Organic Liquids (5/19/05)
Rule 4801 Sulfur Compounds (12/17/92)
CH&SC 41700 Health Risk Assessment
CH&SC 42301.6 School Notice
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA
Guidelines

III. Project Location

The tanks will be located at the 35R Gas Processing Stationary Source NW Section 35, T30S, R23E. The facility will not be located near residential areas, sensitive receptors or within 1000 feet of any school.

IV. Process Description

The subject tanks will be used in the cryogenic gas plant for storage of amine ('-233), glycol ('-234), and slop oil ('239). Vapors from the tanks will be collected and sent to the gas gathering system.

Process Flow Diagrams are included in **Attachment I**.

V. Equipment Listing

Pre-Project Equipment Description:

~~ATC S-2234-233-0: 2000 GALLON AMINE SUMP TANK~~

~~ATC S-2234-234-0: 3000 GALLON GLYCOL SUMP TANK~~

~~ATC S-2234-239-0: 500 BBL SLOP OIL TANK~~

Post Project Equipment Description:

ATC S-2234-233-1: 2000 GALLON AMINE SUMP TANK CONNECTED TO EXISTING GAS GATHERING SYSTEM

ATC S-2234-234-1: 3000 GALLON GLYCOL SUMP TANK CONNECTED TO EXISTING GAS GATHERING SYSTEM

ATC S-2234-239-1: 500 BBL SLOP OIL TANK CONNECTED TO EXISTING GAS GATHERING SYSTEM

VI. Emission Control Technology Evaluation

Fugitive Emissions (all ATCs)

Leaks from fugitive emissions components will be controlled by implementation of an I&M program consistent with the requirements of Rule 4409. Because emissions are calculated using EPA Average Leak Rate equations with a leak threshold of 2000 ppmv for all components except tank components and 10,000 ppmv for components from tanks S-2234-233, '-234, and '-239 to vapor control system trunk line, leaks exceeding these thresholds are a violation of the permit as stated in the following conditions:

For components affixed to the tank or within 5 feet of the tank 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 to 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 more than 3 drops per minute. A gas or liquid leak is a violation of this permit and shall be reported as a deviation. [District Rule 2201] Y

For components connecting the tank to the gas gathering system 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 2,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to 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 more than 3 drops per minute. A gas or liquid leak is a violation of this permit and shall be reported as a deviation. [District Rule 2201] Y

The vapor control efficiency is expected to be at least 99%.

VII. General Calculations

A. Assumptions

- Facility operates 24 hr/day 365 days per year.
- The VOC content of fugitive emissions is 100% by weight.

Amine Tank Fugitive Emissions Component Counts*

	Valves	Pump Seals	Others		Connectors	Flanges	
	LCO	LCO	G/LL	LCO	LCO	G/LL	LCO
S-2234-233	9	9	2	3	10	3	14

*G/LL, gas light liquid, LCO, light crude oil, subject to 10,000 ppmv leak definition

Glycol Tank Fugitive Emissions Component Counts*

	Valves	Pump Seals	Others		Connectors	Flanges	
	HCO	HCO	G/LL	HCO	HCO	G/LL	HCO
S-2234-234	9	9	2	3	10	3	14

*G/LL, gas light liquid, HCO, heavy crude oil, subject to 10,000 ppmv leak definition

Slop Oil Tank Fugitive Emissions Component Counts*

	Valves	Pump Seals	Others		Connectors	Flanges	
	LCO	LCO	G/LL	LCO	LCO	G/LL	LCO
S-2234-239	4	0	4	0	5	5	6

*G/LL, gas light liquid, LCO, light crude oil, subject to 10,000 ppmv leak definition

Vapor Control System*

Valves	Others	Connectors	Flanges
G/LL	G/LL	G/LL	G/LL
22	3	158	11

*G/LL, gas light liquid, subject to 2,000 ppmv leak definition

B. Emission Factors

Fugitive Emissions

Fugitive VOC emissions have been quantified for Average Leak Rate (ALR) equations with a leak threshold (other equipment) in EPA, "Protocol for Estimating Leak Emissions" (EPA – 453/R-95-017, November 1995) Table 5-7, "Equation Relating Average Leak Rate to Fraction Leaking at Oil and Gas Production Operation Units" (**Attachment II**). The leak threshold is 2000 ppm for vapor control system components and 10,000 ppmv components affixed to the tank and on the trunk line from the tank to the vapor control system. In calculating the DEL associated with fugitive emissions, the "LKFRAC" term in these equations, representing the number of allowable leaks, was assumed to be zero.

C. Calculations

1. Pre-Project Potential to Emit (PE1)

Since this is a new emissions unit, PE1 = 0 for all pollutants.

2. Post Project Potential to Emit (PE2)

Permit unit	VOC - Daily PE1 (lb/day)	VOC- Annual PE1 (lb/Year)
S-2234-233	0.132	
VCS	0.096	
Total	0.23~0.2	73
S-2234-234	0.023	
VCS	0.096	
Total	0.12~0.1	37
S-2234-239	0.034	
VCS	0.096	
Total	0.13~0.1	37

Greenhouse Gas Emissions

GWP for CH₄ = 23 lb-CO₂e per lb-CH₄

Assume all VOCs are CH₄ as worst case.

147 lb VOC/yr x 23 lb-CO₂e per lb-CH₄/2000 lb/ton = 2 tons/yr

The emissions profiles are included in **Attachment III**.

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to District Rule 2201, the SSPE1 is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of Emission Reduction Credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions (AER) that have occurred at the source, and which have not been used on-site.

Since facility emissions are already above the Offset and Major Source Thresholds for VOC emissions, SSPE1 calculations are not necessary.

4. Post Project Stationary Source Potential to Emit (SSPE2)

Pursuant to District Rule 2201, the SSPE2 is the PE from all units with valid ATCs or PTOs at the Stationary Source and the quantity of ERCs which have been banked since September 19, 1991 for AER that have occurred at the source, and which have not been used on-site.

Since facility emissions are already above the Offset and Major Source Thresholds for VOC emissions, SSPE2 calculations are not necessary.

5. Major Source Determination

Rule 2201 Major Source Determination:

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following shall not be included:

- any ERCs associated with the stationary source
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165

Rule 2201 Major Source Determination (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
Facility emissions pre-project*	2,355,577	219,087	270,247	7,649,782	3,723,276
Facility emissions – post project	2,355,577	219,087	270,247	7,649,782	3,723,276 + 2 x 37 + 73 = 3,723,423
Major Source Threshold	20,000	140,000	140,000	200,000	20,000
Major Source?	yes	yes	yes	yes	Yes

*from District calculator current PTOs, conservatively low

As seen in the table above, the facility is an existing Major Source for VOCs and is not becoming a Major Source for NO_x, SO_x, PM₁₀, or CO as a result of this project.

Rule 2410 Major Source Determination:

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). Therefore the following PSD Major Source thresholds are applicable.

PSD Major Source Determination (tons/year)							
	NO ₂	VOC	SO ₂	CO	PM	PM ₁₀	CO _{2e}
Estimated Facility PE before Project Increase	1178	1862	110	3825	120	120	>100,000*
PSD Major Source Thresholds	250	250	250	250	250	250	100,000
PSD Major Source ? (Y/N)	Y	Y	Y	Y	N	N	Y

*assumed to be > 100,000 tons/yr

As shown above, the facility is an existing major source for PSD for at least one pollutant. Therefore the facility is an existing major source for PSD.

6. Baseline Emissions (BE)

The BE calculation (in lbs/year) is performed pollutant-by-pollutant for each unit within the project to calculate the QNEC, and if applicable, to determine the amount of offsets required.

Pursuant to District Rule 2201, BE = PE1 for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to District Rule 2201.

S-2234-233, '-234, and '-239:

Since these are new emissions units, BE = PE1 = 0 for all pollutants.

7. SB 288 Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

Since this source is not included in the 28 specific source categories specified in 40 CFR 51.165, the increases in fugitive emissions are not included in the SB 288 Major Modification calculation.

This project does not constitute a SB288 Major Modification.

8. Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

Since this source is not included in the 28 specific source categories specified in 40 CFR 51.165, the increases in fugitive emissions are not included in the Federal Major Modification determination.

This project does not constitute a Federal Major Modification.

9. Rule 2410 – Prevention of Significant Deterioration (PSD) Applicability Determination

Rule 2410 applies to pollutants for which the District is in attainment or for unclassified, pollutants. The pollutants addressed in the PSD applicability determination are listed as follows:

- NO₂ (as a primary pollutant)
- SO₂ (as a primary pollutant)
- CO
- PM
- PM₁₀
- Greenhouse gases (GHG): CO₂, N₂O, CH₄, HFCs, PFCs, and SF₆

The first step of this PSD evaluation consists of determining whether the facility is an existing PSD Major Source or not (See Section VII.C.5 of this document).

Note that in the case the facility is an existing PSD Major Source, the second step of the PSD evaluation is to determine if the project results in a PSD significant increase.

I. Project Location Relative to Class 1 Area

As demonstrated in the “PSD Major Source Determination” Section above, the facility was determined to be a existing major source for PSD. Because the project is not located within 10 km of a Class 1 area – modeling of the emission increase is not required to determine if the project is subject to the requirements of Rule 2410.

II. Significance of Project Emission Increase Determination

a. Potential to Emit of attainment/unclassified pollutant for New or Modified Emission Units vs PSD Significant Emission Increase Thresholds

As a screening tool, the potential to emit from all new and modified units is compared to the PSD significant emission increase thresholds, and if total potential to emit from all new and modified units is below this threshold, no further analysis will be needed.

PSD Significant Emission Increase Determination: Potential to Emit (tons/year)						
	NO2	SO2	CO	PM	PM10	CO2e
Total PE from New and Modified Units	0	0	0	0	0	2*
PSD Significant Emission Increase Thresholds	40	40	100	25	15	75,000
PSD Significant Emission Increase?	N	N	N	N	N	N

*GWP for CH₄ = 23 lb-CO₂e per lb-CH₄

Assume all VOCs are CH₄ as worst case.

147 lb VOC/yr x 23 lb-CO₂e per lb-CH₄/2000 lb/ton = 2 tons/yr

As demonstrated above, because the project has a total potential to emit from all new and modified emission units below the PSD significant emission increase thresholds, this project is not subject to the requirements of Rule 2410 due to a significant emission increase and no further discussion is required.

10. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. As the permit units are new QNEC = PE2/4.

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless specifically exempted by Rule 2201, BACT shall be required for the following actions*:

- a. Any new emissions unit with a potential to emit exceeding two pounds per day,
- b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
- c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
- d. Any new or modified emissions unit, in a stationary source project, which results in an SB 288 Major Modification or a Federal Major Modification, as defined by the rule.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

The facility is proposing three new tanks with emissions less than 2 lb/day. Additionally, no relocations or modifications are proposed (items b and c above) and this project is not a SB 288 or Federal Major Modification. Therefore BACT is not triggered.

B. Offsets

1. Offset Applicability

Offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the SSPE2 equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The SSPE2 exceeds the offsets threshold for VOCs and therefore calculations are required.

2. Quantity of Offsets Required

The facility is proposing to install new emissions units; therefore Baseline Emissions are equal to zero. Also, there are no increases in cargo carrier emissions. Offsets can be determined as follows:

Offsets Required (lb/year) = PE2 x DOR

VOC emissions from each tank are less than 0.5 lb/day and therefore pursuant to District Policy APR 1130, which states that IPEs less than or equal to 0.5 lb/day are to be set to zero for purposes of providing emission offsets, offsets are not required.

C. Public Notification

1. Applicability

Public noticing is required for:

- a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
- b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- c. Any project which results in the offset thresholds being surpassed, and/or
- d. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant.

a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

As demonstrated in VII.C.7, this project does not constitute an SB 288 or Federal Major Modification; therefore, public noticing for SB 288 or Federal Major Modification purposes is not required.

b. PE > 100 lb/day

Applications which include a new emissions unit with a PE greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. As seen in Section VII.C.2 above, this project does not include a new emissions unit which has daily emissions greater than 100 lb/day for any pollutant, therefore public noticing for PE > 100 lb/day purposes is not required.

c. Offset Threshold

SSPE1 exceeds the offset threshold for VOCs. Therefore, the VOC offsets threshold was not surpassed by the project; therefore public noticing is not required for offset purposes.

d. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE = SSPE2 – SSPE1. The SSIPE for the project, 147 lb/yr, is less than 20,000 lb/year; therefore public noticing for SSIPE purposes is not required.

2. Public Notice Action

As discussed above, this project will not result in emissions, for any pollutant, which would subject the project to any of the noticing requirements listed above. Therefore, public notice will not be required for this project.

D. Daily Emission Limits (DELs)

DELs and other enforceable conditions are required by Rule 2201 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. The DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

Proposed Rule 2201 (DEL) Conditions:

S-2234-233

VOC fugitive emissions from tank and from components in piping from tank to vapor control system trunk line shall not exceed 0.23 lb/day. [District Rule 2201] Y

VOC fugitive emissions from tank vapor control system shall not exceed 0.1 lb/day. [District Rule 2201] Y

S-2234-234

VOC fugitive emissions from tank and from components in piping from tank to vapor control system trunk line shall not exceed 0.12 lb/day. [District Rule 2201] Y

VOC fugitive emissions from tank vapor control system shall not exceed 0.1 lb/day. [District Rule 2201] Y

S-2234-239

VOC fugitive emissions from tank and from components in piping from tank to vapor control system trunk line shall not exceed 0.13 lb/day. [District Rule 2201] Y

VOC fugitive emissions from tank vapor control system shall not exceed 0.1 lb/day. [District Rule 2201] Y

E. Compliance Assurance

1. Source Testing

Pursuant to District Policy APR 1705, source testing is not required to demonstrate compliance with Rule 2201.

2. Monitoring

Tank leak monitoring is required as stated in the following conditions:

Operator shall visually inspect storage 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 shell and roof of the uninsulated tank for structural integrity annually. [District Rules 2201 and 4623] Y

Upon detection of a liquid leak from storage tank, 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] Y

Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 parts per million by volume (ppmv) for the tank and 2,000 parts per million by volume (ppmv) for the tank vapor control system measured in accordance with EPA Method 21, operator shall take on 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] Y

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] Y

If a component type for storage tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank 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] Y

3. Recordkeeping

Fugitive emissions records and an inspection log must be maintained as stated in the following conditions:

For components affixed to the tank or within 5 feet of the tank, permittee shall maintain with the permit accurate fugitive component counts and resulting emissions from tank components and from components in piping from the tank to vapor control system truck line calculated using (ALR) equations for a 10,000 ppmv leak threshold included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). [District Rule 2201] Y

For components connecting the tank to the gas gathering system, permittee shall maintain with the permit accurate fugitive component counts and resulting emissions from tank components and from components in piping from the tank to vapor control system truck line calculated using (ALR) equations for a 2,000 ppmv leak threshold included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). [District Rule 2201] Y

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] Y

{2983} All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320]

4. Reporting

Leaks from fugitive emissions must be reported as a deviation as stated in the following conditions:

For components affixed to the tank or within 5 feet of the tank 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 to 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 more than 3 drops per minute. A gas or liquid leak is a violation of this permit and shall be reported as a deviation. [District Rule 2201] Y

For components connecting the tank to the gas gathering system 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 2,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to 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 more than 3 drops per minute. A gas or liquid leak is a violation of this permit and shall be reported as a deviation. [District Rule 2201] Y

Rule 2520 Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. The proposed modification is a Minor Modification to the Title V Permit.

In accordance with Rule 2520, 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.

As discussed above, the facility has applied for a Certificate of Conformity (COC). Therefore, the facility must apply to modify their Title V permit with an administrative amendment prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility may construct/operate under the ATC upon submittal of the Title V administrative amendment/minor modification application.

OEHI's Title V Compliance Certification form is included in **Attachment IV**.

Rule 4102 Nuisance

Rule 4102 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – *Risk Management Policy for Permitting New and Modified Sources* specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

An HRA is not required for a project with a total facility prioritization score of less than one. According to the Technical Services Memo for this project (**Attachment V**), the total facility prioritization score including this project was greater than one. Therefore, an HRA was required to determine the short-term acute and long-term chronic exposure from this project.

The cancer risk for this project is shown below:

HRA Summary		
Unit	Cancer Risk	T-BACT Required
S-2234-233-1, '-234-1, and '-239-1	3.45 x 10 ⁻¹¹	No

Rule 4409 Component at Light Crude Oil Production Facilities, Natural Gas Production Facilities, and Natural Gas Processing Facilities

Facility S-2234 includes requirements of the rule in the facility wide PTO S-2234-0-3. Continued compliance is expected.

Rule 4623 Storage of Organic Liquids

Section 5.1 requires that an operator shall not place, hold, or store organic liquid in any tank unless such tank is equipped with a VOC control system. The new tanks will be connected to vapor control system vented to a gas pipeline. The expected control efficiency is 99%. The rule requires no recordkeeping requirements for tanks equipped with vapor control.

The following conditions will be included on the ATCs:

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 99% by weight as determined by the test method specified in Section 6.4.7. [District Rules 2201 and 4623] Y

The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rules 2201 and 4623] Y

All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Y
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 Rules 2201 and 4623] Y

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] Y

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 shell and roof of the uninsulated tank for structural integrity annually. [District Rules 2201 and 4623] Y

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] Y

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 on 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] Y

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] Y

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] Y

If a component type for the tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank 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] Y

Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rule 2201] Y

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] Y

Compliance with the rule requirements is expected.

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

California Environmental Quality Act (CEQA)

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The District adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and

- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that all project specific emission unit(s) are exempt from Best Available Control Technology (BACT) requirements. Furthermore, the District conducted a Risk Management Review and concludes that potential health impacts are less than significant.

Issuance of permits for emissions units not subject to BACT requirements and with health impact less than significant is a matter of ensuring conformity with applicable District rules and regulations and does not require discretionary judgment or deliberation. Thus, the District concludes that this permitting action constitutes a ministerial approval. Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Pending a successful COC Noticing period, issue ATCs S-2234-233-1, '-234-1, and '-239-1 subject to the permit conditions on the attached draft ATC in **Attachment VI**.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
S-2234-233	3020-05A	2000 gallons	\$75.00
S-2234-234	3020-05A	3000 gallons	\$75.00
S-2234-239	3020-05C	21,000 gallons	\$135.00

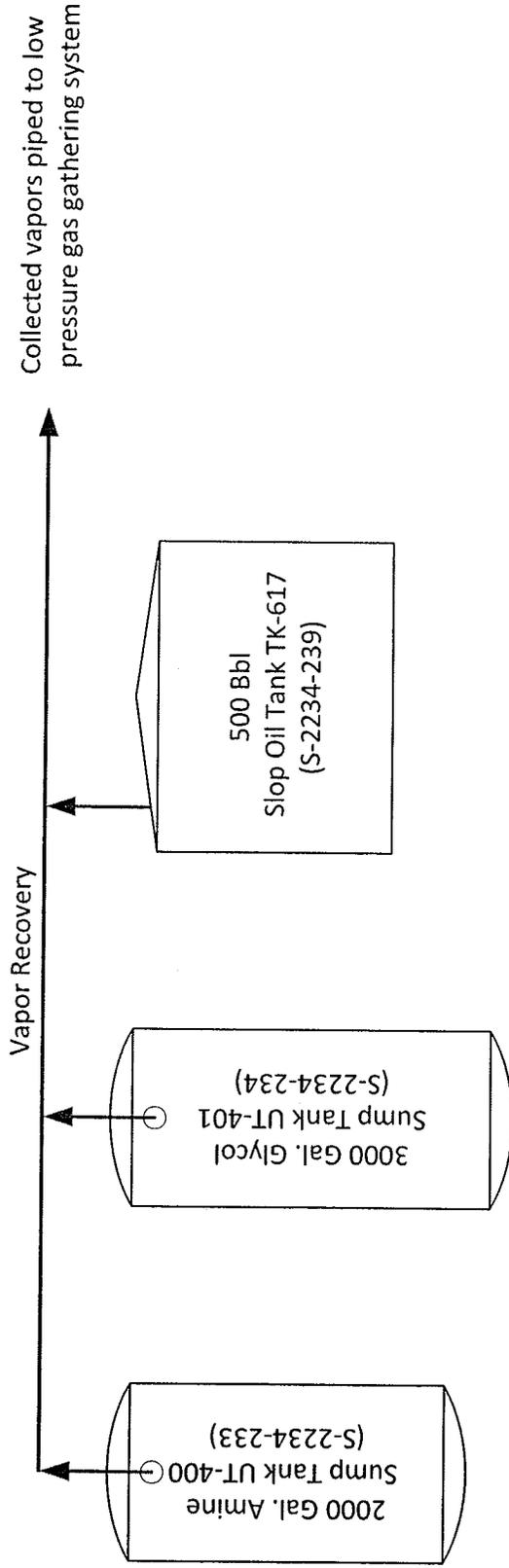
Attachments

- I: Process Flow Diagrams
- II: Fugitive Emissions Calculations
- III: Emissions Profiles
- IV: Compliance Certification
- V: HRA Summary
- VI: Draft ATCs

Attachments

- I: Process Flow Diagrams
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ATTACHMENT I
Process Flow Diagrams



Occidental of Elk Hills, Inc.
PROCESS FLOW DIAGRAM OF PROPOSED VAPOR RECOVERY SYSTEM
 Date: 01/29/13 Project No. 1124365

ATTACHMENT II
Fugitive Emissions Calculations

**Fugitive VOC Emissions From Components
Calculated Using EPA ALR Emission Factors**

Fugitive Emissions From Slop Oil Tank

Type of Component	Component Service	Component Counts	Leak Threshold (ppmv)	Leak Fraction	EPA 1995 ALR TOG Factor lb/day*Component	Fugitive Emissions		
						TOG (lb/Day)	VOC (lb/Day)	Methane (lb/Day)
Valves	Gas/Light Liquid	0	10,000	0.0000	1.320E-03	0.000	0.000	0.000
	Light Crude Oil	4	10,000	0.0000	1.003E-03	0.004	0.004	0.002
	Heavy Crude Oil	0	10,000	0.0000	4.435E-04	0.000	0.000	0.000
Pump Seals	Gas/Light Liquid	0	10,000	0.0000	1.848E-02	0.000	0.000	0.000
	Light Crude Oil	0	10,000	0.0000	2.693E-02	0.000	0.000	0.000
	Heavy Crude Oil	0	10,000	0.0000	0.000E+00	0.000	0.000	0.000
Others	Gas/Light Liquid	4	10,000	0.0000	6.336E-03	0.025	0.025	0.010
	Light Crude Oil	0	10,000	0.0000	7.392E-03	0.000	0.000	0.000
	Heavy Crude Oil	0	10,000	0.0000	1.690E-03	0.000	0.000	0.000
Connectors	Gas/Light Liquid	0	10,000	0.0000	5.280E-04	0.000	0.000	0.000
	Light Crude Oil	5	10,000	0.0000	5.122E-04	0.003	0.003	0.001
	Heavy Crude Oil	0	10,000	0.0000	0.000E+00	0.000	0.000	0.000
Flanges	Gas/Light Liquid	5	10,000	0.0000	3.010E-04	0.002	0.002	0.001
	Light Crude Oil	6	10,000	0.0000	1.267E-04	0.001	0.001	0.000
	Heavy Crude Oil	0	10,000	0.0000	0.000E+00	0.000	0.000	0.000
Open-ended Lines	Gas/Light Liquid	0	10,000	0.0000	7.920E-04	0.000	0.000	0.000
	Light Crude Oil	0	10,000	0.0000	7.392E-04	0.000	0.000	0.000
	Heavy Crude Oil	0	10,000	0.0000	3.802E-04	0.000	0.000	0.000
Total Fugitive VOC Emissions From Associated Components (lb/day)						0.034	0.034	0.013
Gas	VOC content (%) of TOG	100.00				Methane content (%) of TOG		37.50
Liquid	VOC content (%) of TOG	100.00				Methane content (%) of TOG		37.50

**Fugitive VOC Emissions From Components
Calculated Using EPA ALR Emission Factors**

Fugitive Emissions From Glycol Sump Tank

Type of Component	Component Service	Component Counts	Leak Threshold (ppmv)	Leak Fraction	EPA 1995 ALR TOG Factor lb/day*Component	Fugitive Emissions		
						TOG (lb/Day)	VOC (lb/Day)	Methane (lb/Day)
Valves	Gas/Light Liquid	0	10,000	0.0000	1.320E-03	0.000	0.000	0.000
	Light Crude Oil	0	10,000	0.0000	1.003E-03	0.000	0.000	0.000
	Heavy Crude Oil	9	10,000	0.0000	4.435E-04	0.004	0.004	0.001
Pump Seals	Gas/Light Liquid	0	10,000	0.0000	1.848E-02	0.000	0.000	0.000
	Light Crude Oil	0	10,000	0.0000	2.693E-02	0.000	0.000	0.000
	Heavy Crude Oil	3	10,000	0.0000	0.000E+00	0.000	0.000	0.000
Others	Gas/Light Liquid	2	10,000	0.0000	6.336E-03	0.013	0.013	0.005
	Light Crude Oil	0	10,000	0.0000	7.392E-03	0.000	0.000	0.000
	Heavy Crude Oil	3	10,000	0.0000	1.690E-03	0.005	0.005	0.002
Connectors	Gas/Light Liquid	0	10,000	0.0000	5.280E-04	0.000	0.000	0.000
	Light Crude Oil	0	10,000	0.0000	5.122E-04	0.000	0.000	0.000
	Heavy Crude Oil	10	10,000	0.0000	0.000E+00	0.000	0.000	0.000
Flanges	Gas/Light Liquid	3	10,000	0.0000	3.010E-04	0.001	0.001	0.000
	Light Crude Oil	0	10,000	0.0000	1.267E-04	0.000	0.000	0.000
	Heavy Crude Oil	14	10,000	0.0000	0.000E+00	0.000	0.000	0.000
Open-ended Lines	Gas/Light Liquid	0	10,000	0.0000	7.920E-04	0.000	0.000	0.000
	Light Crude Oil	0	10,000	0.0000	7.392E-04	0.000	0.000	0.000
	Heavy Crude Oil	0	10,000	0.0000	3.802E-04	0.000	0.000	0.000
Total Fugitive VOC Emissions From Associated Components (lb/day)						0.023	0.023	0.008
Gas	VOC content (%) of TOG		100.00			Methane content (%) of TOG		37.50
Liquid	VOC content (%) of TOG		100.00			Methane content (%) of TOG		37.50

**Fugitive VOC Emissions From Components
Calculated Using EPA ALR Emission Factors**

Fugitive Emissions From Amine Sump Tank

Type of Component	Component Service	Component Counts	Leak Threshold (ppmv)	Leak Fraction	EPA 1995 ALR TOG/day*Component	Fugitive Emissions		
						TOG (lb/Day)	VOC (lb/Day)	Methane (lb/Day)
Valves	Gas/Light Liquid	0	10,000	0.0000	1.320E-03	0.000	0.000	0.000
	Light Crude Oil	9	10,000	0.0000	1.003E-03	0.009	0.009	0.003
	Heavy Crude Oil	0	10,000	0.0000	4.435E-04	0.000	0.000	0.000
Pump Seals	Gas/Light Liquid	0	10,000	0.0000	1.848E-02	0.000	0.000	0.000
	Light Crude Oil	3	10,000	0.0000	2.693E-02	0.081	0.081	0.030
	Heavy Crude Oil	0	10,000	0.0000	0.000E+00	0.000	0.000	0.000
Others	Gas/Light Liquid	2	10,000	0.0000	6.336E-03	0.013	0.013	0.005
	Light Crude Oil	3	10,000	0.0000	7.392E-03	0.022	0.022	0.008
	Heavy Crude Oil	0	10,000	0.0000	1.690E-03	0.000	0.000	0.000
Connectors	Gas/Light Liquid	0	10,000	0.0000	5.280E-04	0.000	0.000	0.000
	Light Crude Oil	10	10,000	0.0000	5.122E-04	0.005	0.005	0.002
	Heavy Crude Oil	0	10,000	0.0000	0.000E+00	0.000	0.000	0.000
Flanges	Gas/Light Liquid	3	10,000	0.0000	3.010E-04	0.001	0.001	0.000
	Light Crude Oil	14	10,000	0.0000	1.267E-04	0.002	0.002	0.001
	Heavy Crude Oil	0	10,000	0.0000	0.000E+00	0.000	0.000	0.000
Open-ended Lines	Gas/Light Liquid	0	10,000	0.0000	7.920E-04	0.000	0.000	0.000
	Light Crude Oil	0	10,000	0.0000	7.392E-04	0.000	0.000	0.000
	Heavy Crude Oil	0	10,000	0.0000	3.802E-04	0.000	0.000	0.000
Total Fugitive VOC Emissions From Associated Components (lb/day)						0.132	0.132	0.050
Gas	VOC content (%) of TOG	100.00					Methane content (%) of TOG	37.50
Liquid	VOC content (%) of TOG	100.00					Methane content (%) of TOG	37.50

ATTACHMENT III Emissions Profiles

Permit #: S-2234-233-1	Last Updated	
Facility: OCCIDENTAL OF ELK HILLS INC	01/24/2013	EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	73.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	19.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-2234-234-1	Last Updated
Facility: OCCIDENTAL OF ELK HILLS INC	01/24/2013 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	37.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.1
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	9.0
Q2:	0.0	0.0	0.0	0.0	9.0
Q3:	0.0	0.0	0.0	0.0	9.0
Q4:	0.0	0.0	0.0	0.0	10.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-2234-239-1	Last Updated
Facility: OCCIDENTAL OF ELK HILLS INC	01/24/2013 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	37.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.1
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	9.0
Q2:	0.0	0.0	0.0	0.0	9.0
Q3:	0.0	0.0	0.0	0.0	9.0
Q4:	0.0	0.0	0.0	0.0	10.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

ATTACHMENT IV
Compliance Certification

**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: Occidental of Elk Hills, Inc.	FACILITY ID: S - 2234
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:	
3. Agent to the Owner: Occidental of Elk Hills, Inc.	

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

- Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the source 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:

Armando G. Gonzalez
Signature of Responsible Official

12/06/2012
Date

Armando G. Gonzalez
Name of Responsible Official (please print)

Health, Environment & Safety Mgr
Title of Responsible Official (please print)

ATTACHMENT V
HRA Summary

San Joaquin Valley Air Pollution Control District Risk Management Review

To: Richard Edgehill – Permit Services
 From: Cheryl Lawler – Technical Services
 Date: February 4, 2013
 Facility Name: Occidental of Elk Hills Inc.
 Location: Gas Plant Stationary Source
 Application #(s): S-2234-233-1, 234-1, 239-1
 Project #: S-1124365

A. RMR SUMMARY

RMR Summary					
Categories	Amine Sump (Unit 233-1)	Glycol Sump (Unit 234-1)	Slop Oil Tank (Unit 239-1)	Project Totals	Facility Totals
Prioritization Score	0.00	0.00	0.00	0.00	>1
Acute Hazard Index	0.00	0.00	0.00	0.00	0.09
Chronic Hazard Index	0.00	0.00	0.00	0.00	0.03
Maximum Individual Cancer Risk	1.71E-11	8.60E-12	8.75E-12	3.45E-11	2.38E-06
T-BACT Required?	No	No	No		
Special Permit Conditions?	No	No	No		

I. Project Description

Technical Services received a request on January 24, 2013, to perform a Risk Management Review for VOC fugitive emissions from an amine sump, a glycol sump, and a slop oil tank.

II. Analysis

Toxic emissions from oilfield fugitives were calculated using emission factors based on the 1991 California Polytechnic State University Study, *Development Of Species Profiles For Selected Organic Emission Sources*, along with VOC fugitive emission rates supplied by the processing engineer. In accordance with the District's *Risk Management Policy for Permitting New and Modified Sources* (APR 1905-1, March 2, 2001), risks from the project were prioritized using the procedures in the 1990 CAPCOA Facility Prioritization Guidelines and incorporated in the District's HEART's database. The prioritization score for the project was less than 1.0 (see RMR Summary Table); however, the facility's combined prioritization scores totaled to greater than one. Therefore, a refined Health Risk Assessment was required and performed for the project. AERMOD was used with area source parameters outlined below and concatenated 5-year meteorological data from Bakersfield to determine maximum dispersion factors at the nearest residential and business receptors. The dispersion factors were input into the HARP model to calculate the Chronic and Acute Hazard Indices and the Carcinogenic Risk.

The following parameters were used for the review:

Analysis Parameters			
Source Types	Area	Closest Receptor (m)	10,268
Length of Sides for each Area (m)	1.28 x 1.28	Location Type	Rural
	1.56 x 1.56		
	4.16 x 4.16		
Release Heights (m)	0	VOC Emission Rates for each Unit (lb/yr)	73
	0		37
	4.57		37

III. Conclusions

The acute and chronic indices are below 1.0; and the maximum individual cancer risk associated with the project is **3.45E-11**, which is less than the 1 in a million threshold. In accordance with the District's Risk Management Policy, the project is approved **without** Toxic Best Available Control Technology (T-BACT).

These conclusions are based on the data provided by the applicant and the project engineer. Therefore, this analysis is valid only as long as the proposed data and parameters do not change.

Attachments

RMR Request Form
Prioritization
Risk Results
Facility Summary

ATTACHMENT VI
Draft ATCs

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-2234-233-1

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS INC
MAILING ADDRESS: 10800 STOCKDALE HIGHWAY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: NW35 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
2000 GALLON AMINE SUMP TANK CONNECTED TO EXISTING GAS GATHERING SYSTEM

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Storage tank shall be equipped with a vapor recovery system consisting of a closed vent system that routes all VOCs from the storage tank to a field gas gathering system. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. Storage tank and 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

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

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DAVID WARNER, Director of Permit Services

S-2234-233-1 : Feb 4 2013 3:47PM - EDGEHILR : Joint Inspection NOT Required

6. For components affixed to the tank or within 5 feet of the tank 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 to 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 more than 3 drops per minute. A gas or liquid leak is a violation of this permit and shall be reported as a deviation. [District Rule 2201] Federally Enforceable Through Title V Permit
7. For components connecting the tank to the gas gathering system 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 2,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to 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 more than 3 drops per minute. A gas or liquid leak is a violation of this permit and shall be reported as a deviation. [District Rule 2201] Federally Enforceable Through Title V Permit
8. VOC fugitive emissions from tank and from components in piping from tank to vapor control system trunk line shall not exceed 0.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. VOC fugitive emissions from tank vapor control system shall not exceed 0.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. For components affixed to the tank or within 5 feet of the tank, permittee shall maintain with the permit accurate fugitive component counts and resulting emissions from tank components and from components in piping from the tank to vapor control system truck line calculated using (ALR) equations for a 10,000 ppmv leak threshold included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). [District Rule 2201] Federally Enforceable Through Title V Permit
11. For components connecting the tank to the gas gathering system, permittee shall maintain with the permit accurate fugitive component counts and resulting emissions from tank components and from components in piping from the tank to vapor control system truck line calculated using (ALR) equations for a 2,000 ppmv leak threshold included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). [District Rule 2201] Federally Enforceable Through Title V Permit
12. Gas-leak concentration shall be determined by EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Permittee shall comply with applicable monitoring, inspection, maintenance, and recordkeeping, and reporting requirements of Rule 4409. [District Rule 4409] Federally Enforceable Through Title V Permit
14. Any tank gauging or sampling device on storage 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
15. Operator shall visually inspect storage 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 shell and roof of the uninsulated tank for structural integrity annually. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
16. Upon detection of a liquid leak from storage tank, 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
17. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 parts per million by volume (ppmv) for the tank and 2,000 parts per million by volume (ppmv) for the tank vapor control system measured in accordance with EPA Method 21, operator shall take on 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

CONDITIONS CONTINUE ON NEXT PAGE

18. 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
19. If a component type for storage tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank 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
20. 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
21. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
22. ATC S-2234-233-0 shall be cancelled upon implementation of this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-2234-234-1

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS INC
MAILING ADDRESS: 10800 STOCKDALE HIGHWAY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: NW35 **TOWNSHIP:** 30S **RANGE:** R23E

EQUIPMENT DESCRIPTION:
3000 GALLON GLYCOL SUMP TANK CONNECTED TO EXISTING GAS GATHERING SYSTEM

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Storage tank shall be equipped with a vapor recovery system consisting of a closed vent system that routes all VOCs from the storage tank to a field gas gathering system. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. Storage tank and 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

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

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DAVID WARNER, Director of Permit Services
S-2234-234-1 : Feb 4 2013 3:47PM -- EDGEHILR : Joint Inspection NOT Required

6. For components affixed to the tank or within 5 feet of the tank 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 to 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 more than 3 drops per minute. A gas or liquid leak is a violation of this permit and shall be reported as a deviation. [District Rule 2201] Federally Enforceable Through Title V Permit
7. For components connecting the tank to the gas gathering system 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 2,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to 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 more than 3 drops per minute. A gas or liquid leak is a violation of this permit and shall be reported as a deviation. [District Rule 2201] Federally Enforceable Through Title V Permit
8. VOC fugitive emissions from tank and from components in piping from tank to vapor control system trunk line shall not exceed 0.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. VOC fugitive emissions from tank vapor control system shall not exceed 0.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. For components affixed to the tank or within 5 feet of the tank, permittee shall maintain with the permit accurate fugitive component counts and resulting emissions from tank components and from components in piping from the tank to vapor control system truck line calculated using (ALR) equations for a 10,000 ppmv leak threshold included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). [District Rule 2201] Federally Enforceable Through Title V Permit
11. For components connecting the tank to the gas gathering system, permittee shall maintain with the permit accurate fugitive component counts and resulting emissions from tank components and from components in piping from the tank to vapor control system truck line calculated using (ALR) equations for a 2,000 ppmv leak threshold included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). [District Rule 2201] Federally Enforceable Through Title V Permit
12. Gas-leak concentration shall be determined by EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Permittee shall comply with applicable monitoring, inspection, maintenance, and recordkeeping, and reporting requirements of Rule 4409. [District Rule 4409] Federally Enforceable Through Title V Permit
14. Any tank gauging or sampling device on storage 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
15. Operator shall visually inspect storage 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 shell and roof of the uninsulated tank for structural integrity annually. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
16. Upon detection of a liquid leak from storage tank, 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
17. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 parts per million by volume (ppmv) for the tank and 2,000 parts per million by volume (ppmv) for the tank vapor control system measured in accordance with EPA Method 21, operator shall take on 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

CONDITIONS CONTINUE ON NEXT PAGE

18. 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
19. If a component type for storage tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank 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
20. 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
21. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
22. ATC S-2234-234-0 shall be cancelled upon implementation of this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

DRAFT

PERMIT NO: S-2234-239-1

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS INC
MAILING ADDRESS: 10800 STOCKDALE HIGHWAY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: NW35 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
500 BBL SLOP OIL TANK CONNECTED TO EXISTING GAS GATHERING SYSTEM

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Storage tank shall be equipped with a vapor recovery system consisting of a closed vent system that routes all VOCs from the storage tank to a field gas gathering system. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. Storage tank and 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

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director, APCO

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DAVID WARNER, Director of Permit Services

S-2234-239-1: Feb 4 2013 3:47PM - EDGEHLR : Joint Inspection NOT Required

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) for tank components and for components in piping from the tank to vapor control system truck line and 2,000 parts per million by volume (ppmv) for all other components including the tank vapor control system, separators, heater, and pumps. The ppmv readings, as methane above background, shall be taken using a portable hydrocarbon detection instrument that is calibrated to 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 more than 3 drops per minute. A gas or liquid leak is a violation of this permit and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. VOC fugitive emissions from tank and from components in piping from tank to vapor control system trunk line shall not exceed 0.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
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9. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions from tank components and from components in piping from the tank to vapor control system truck line calculated using (ALR) equations for a 10,000 ppmv leak threshold included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). [District Rule 2201] Federally Enforceable Through Title V Permit
10. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions from the tank vapor control system calculated using (ALR) equations for a 2,000 ppmv leak threshold included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). [District Rule 2201] Federally Enforceable Through Title V Permit
11. Gas-leak concentration shall be determined by EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
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CONDITIONS CONTINUE ON NEXT PAGE

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20. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
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