



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

DEC 05 2012

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

Re: **Notice of Minor Title V Permit Modification**  
**District Facility # S-1216**  
**Project # 1122691**

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Occidental of Elk Hills is proposing a Title V minor permit modification to incorporate the recently issued S-1216-64-4, '158-0 and '159-0 into the Title V operating permit. The permits are for two new induced gas flotation (IGF) vessels which will be connected to the vapor control system listed on tank S-1216-64.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-1216-64-4, '158-0 and '159-0, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,

David Warner  
Director of Permit Services

Enclosures

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**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  
[www.valleyair.org](http://www.valleyair.org)

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



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

DEC 05 2012

Raymond Rodriguez  
Occidental of Elk Hills  
10800 Stockdale Hwy.  
Bakersfield, CA 93311

**Re: Notice of Minor Title V Permit Modification  
District Facility # S-1216  
Project # 1122691**

Dear Mr. Rodriguez:

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 incorporate recently issued S-1216-64-4, '158-0 and '159-0 into the Title V operating permit. The permits are for two new induced gas flotation (IGF) vessels which will be connected to the vapor control system listed on tank S-1216-64.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-1216-64-4, '158-0 and '159-0, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,

A handwritten signature in black ink, appearing to read "David Warner".

David Warner  
Director of Permit Services

Enclosures

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# TITLE V APPLICATION REVIEW

Minor Modification  
Project #: S-1122691

Engineer: David Torii  
Reviewing Engineer: Rich Karrs *RWK*  
12-4-12

Facility Number: S-1216  
Facility Name: Occidental of Elk Hills  
Mailing Address: 10800 Stockdale Hwy.  
Bakersfield, CA 93311

Contact Name: Raymond Rodriguez  
Phone: 661-412-5263

Responsible Official: Armando Gonzalez  
Title: HES Environmental Manager

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## I. PROPOSAL

Occidental of Elk Hills (OEHI) is proposing a Title V minor permit modification to incorporate ATCs S-1216-64-4, '158-0 and '159-0 into their Title V operating permit.

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 is located at the 23Z Water Disposal within the NE/4 of Section 23, Township 30S, Range 22E in OEHI's Light oil Western stationary source.

## III. EQUIPMENT DESCRIPTION

ATC S-1216-64-4: MODIFICATION OF 3,000 BBL FIXED ROOF WASH TANK SERVED BY A VAPOR CONTROL SYSTEM SHARED WITH S-1216-66, '-72, '-73, '-74 & '-75: CONNECT INDUCED GAS FLOTATION VESSELS S-1216-158 AND '159 TO VAPOR CONTROL

ATC S-1216-158-0: INDUCED GAS FLOTATION VESSEL SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-1216-64

ATC S-1216-159-0: INDUCED GAS FLOATATION VESSEL SERVED BY VAPOR  
CONTROL SYSTEM LISTED ON S-1216-64

**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**

The Changes in the original Permit to Operate and the implemented ATC are as follows:

<b>Condition # on current PTO S-1216-64-4</b>	<b>Condition # on Proposed ATC S-1216-64-4</b>	<b>Condition is New, Modified, or Removed</b>	<b>Reason for Change from Current PTO</b>
	1	Removed	On facility-wide permit
	2	Removed	PTO '64-4 has similar equivalent conditions
	6	Removed	PTO '64-4 has similar equivalent conditions
	7	Removed	PTO '64-4 has similar equivalent conditions
	8	Removed	PTO '0-1 has similar equivalent conditions
	9	Removed	PTO '0-1 has similar equivalent conditions
	10	Removed	PTO '0-1 has similar equivalent conditions
	11	Removed	PTO '0-1 has similar equivalent conditions
	12	Removed	PTO '0-1 has similar equivalent conditions
	13	Removed	PTO '64-4 has similar equivalent conditions
	16	Removed	PTO '64-4 has similar equivalent conditions
	17	Removed	PTO '0-1 has similar equivalent conditions
	18	Removed	PTO '64-4 has similar equivalent conditions
8		New	This condition specifying the fugitive emission factors to be used to calculate the DEL was added
9	19	New	Condition 19 from '64-4 added to PTO '64-5 as condition 8

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<b>Condition # on PTO S-1216-158-1</b>	<b>Condition # on Proposed ATC S-1216-158-0</b>	<b>Condition is New, Modified, or Removed</b>	<b>Reason for Change from Current PTO</b>
	20	Removed	Condition pertained to permit implementation order

<b>Condition # on PTO S-1216-159-1</b>	<b>Condition # on Proposed ATC S-1216-159-0</b>	<b>Condition is New, Modified, or Removed</b>	<b>Reason for Change from Current PTO</b>
	20	Removed	Condition pertained to permit implementation order

## 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;

OEHI  
S-1216, 1122691

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.

# ATTACHMENT A

Proposed Modified Title V Operating Permit Nos.  
(S-1216-64-5, '158-1 and '159-1)

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1216-64-5

**EXPIRATION DATE:** 08/31/2016

**SECTION:** NE 23 **TOWNSHIP:** 30S **RANGE:** 22E

**EQUIPMENT DESCRIPTION:**

3,000 BBL FIXED ROOF WASH TANK SERVED BY A VAPOR CONTROL SYSTEM SHARED WITH S-1216-66, '72, '73, '74, '75, '158 AND '159

## PERMIT UNIT REQUIREMENTS

1. The tank shall be maintained in a leak-free condition and equipped with an APCO approved vapor recovery system consisting of a closed 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 a leak-free condition. The VOC control device shall be one of the following: a condensation or vapor recovery system that connects to a gas processing plant, a field gas pipeline, a pipeline distributing PUC quality gas for sale, an injection well for disposal of vapors, or a VOC control 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. The tank shall be equipped with a fixed roof with no holes or openings. [District NSR Rule] Federally Enforceable Through Title V Permit
3. 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
4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit
5. The control efficiency of any VOC destruction device, measured and calculated as carbon, shall be determined by US EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case US EPA Method 25a may be used. US EPA Method 18 may be used in lieu of US EPA Method 25 or US 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 the known analytes/compounds to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4623] Federally Enforceable Through Title V Permit
6. Except as otherwise provided in this permit, operator shall ensure that the vapor control system is functional and is operating as designed at all times. [District NSR Rule and 4623] Federally Enforceable Through Title V Permit
7. VOC emission rate from vapor, light liquid, and light crude oil components associated with vapor recovery piping shall not exceed 0.3 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Fugitive VOC emissions rate shall be 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
9. Permittee shall maintain accurate records of fugitive emissions and such records shall be made readily available for District inspection upon request for a period of five years. [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.

10. The tank shall comply with the voluntary inspection and maintenance program requirements of conditions 99 through 107 of the Facility-Wide Permit S-1216-0-1. [District Rule 4623] Federally Enforceable Through Title V Permit
11. 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 Rule 4623] Federally Enforceable Through Title V Permit
12. This tank shall be degassed before commencing interior cleaning by following one of the following options: 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, or 2) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system 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
13. 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
14. 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 Rule 4623] Federally Enforceable Through Title V Permit
15. 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
16. 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
17. 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
18. Tank 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
19. 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
20. Permittee shall only transport removed sludge in closed, liquid leak-free containers. [District Rule 4623] Federally Enforceable Through Title V Permit
21. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

22. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit
23. Formerly S-3506-1-0.
24. Formerly S-1641-69.
25. Formerly S-382-798.

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

DRAFT

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1216-158-1

**EXPIRATION DATE:** 08/31/2016

**EQUIPMENT DESCRIPTION:**

INDUCED GAS FLOATION VESSEL SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-1216-64

## PERMIT UNIT REQUIREMENTS

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1. Tank shall vent only to vapor control system listed on S-1216-64. [District Rule 2201] Federally Enforceable Through Title V Permit
2. All 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, 5.3.2] Federally Enforceable Through Title V Permit
3. All piping, valves, and fittings shall be constructed and maintained in a Leak-Free condition. [District Rules 2201 and 4623, 5.6.3] Federally Enforceable Through Title V Permit
4. 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 ppmv, above background, as measured by a portable hydrocarbon detection instrument 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. A reading in excess of 10,000 ppmv above background or the dripping of organic liquid at a rate of more than 3 drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. VOC fugitive emissions from the components in gas and light oil service from the ISF vessel to the vapor control system trunk line shall not exceed 0.21 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Fugitive VOC emissions rate shall be 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
7. All piping, fittings, and valves on this ISF vessel 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. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
8. If any of the ISF vessel components are found to be leaking, operator shall immediately affix a tag and maintain records of liquid leak and gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
9. 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 4623, 5.7 (Table 3)] 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 comply with the following requirements to repair leaking components that have a gas leak >10,000 ppmv (measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane): a. Eliminate the leak within 8 hours after detection; or b. If the leak can not be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices; and c. Eliminate the leak within 48 hours after minimization; and d. In no event that the total time to minimize and eliminate the leak shall exceed 56 hours after detection. [District Rules 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
11. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the specified timeframes, shall not constitute a violation of the District Rule 4623 (amended May 19, 2005). However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified timeframes, shall constitute a violation of the District Rule 4623 (amended May 19, 2005). [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
12. If a component type for a given tank is found to leak during an annual inspection, operator shall then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, operator shall then revert to annual inspections. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
13. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623 (amended May 19, 2005), even if it is under the voluntary inspection and maintenance program. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
14. Permittee shall keep in their facility at all times a copy of the letter sent to the APCO requesting participation in the Rule 4623 Fixed Roof Tank Preventive Inspection and Maintenance Program, and Tank Interior Cleaning Program, and maintain the records of annual tank inspections, maintenance, and cleaning to document the participation in the program. [District Rule 4623, 5.7] Federally Enforceable Through Title V Permit
15. Permittee shall comply with all applicable Tank Interior Cleaning Program requirements specified in Section 5.7 of Rule 4623. [District Rule 4623, 5.7] Federally Enforceable Through Title V Permit
16. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date 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 Rule 1070]
17. The permittee shall keep accurate records of the API gravity of each organic liquid stored in the ISF vessel. [District Rule 4409] Federally Enforceable Through Title V Permit
18. Permittee shall maintain records of number and type of components installed and calculated fugitive emissions. Permittee shall update such records when new components are installed. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070]

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

DRAFT

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1216-159-1

**EXPIRATION DATE:** 08/31/2016

**EQUIPMENT DESCRIPTION:**

INDUCED GAS FLOATION VESSEL SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-1216-64

## PERMIT UNIT REQUIREMENTS

1. Tank shall vent only to vapor control system listed on S-1216-64. [District Rule 2201] Federally Enforceable Through Title V Permit
2. All 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, 5.3.2] Federally Enforceable Through Title V Permit
3. All piping, valves, and fittings shall be constructed and maintained in a Leak-Free condition. [District Rules 2201 and 4623, 5.6.3] Federally Enforceable Through Title V Permit
4. 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 ppmv, above background, as measured by a portable hydrocarbon detection instrument 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. A reading in excess of 10,000 ppmv above background or the dripping of organic liquid at a rate of more than 3 drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. VOC fugitive emissions from the components in gas and light oil service from the ISF vessel to the vapor control system trunk line shall not exceed 0.21 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Fugitive VOC emissions rate shall be 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
7. All piping, fittings, and valves on this ISF vessel 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. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
8. If any of the ISF vessel components are found to be leaking, operator shall immediately affix a tag and maintain records of liquid leak and gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
9. 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 4623, 5.7 (Table 3)] 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 comply with the following requirements to repair leaking components that have a gas leak >10,000 ppmv (measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane): a. Eliminate the leak within 8 hours after detection; or b. If the leak can not be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices; and c. Eliminate the leak within 48 hours after minimization; and d. In no event that the total time to minimize and eliminate the leak shall exceed 56 hours after detection. [District Rules 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
11. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the specified timeframes, shall not constitute a violation of the District Rule 4623 (amended May 19, 2005). However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified timeframes, shall constitute a violation of the District Rule 4623 (amended May 19, 2005). [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
12. If a component type for a given tank is found to leak during an annual inspection, operator shall then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, operator shall then revert to annual inspections. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
13. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623 (amended May 19, 2005), even if it is under the voluntary inspection and maintenance program. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
14. Permittee shall keep in their facility at all times a copy of the letter sent to the APCO requesting participation in the Rule 4623 Fixed Roof Tank Preventive Inspection and Maintenance Program, and Tank Interior Cleaning Program, and maintain the records of annual tank inspections, maintenance, and cleaning to document the participation in the program. [District Rule 4623, 5.7] Federally Enforceable Through Title V Permit
15. Permittee shall comply with all applicable Tank Interior Cleaning Program requirements specified in Section 5.7 of Rule 4623. [District Rule 4623, 5.7] Federally Enforceable Through Title V Permit
16. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date 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 Rule 1070]
17. The permittee shall keep accurate records of the API gravity of each organic liquid stored in the ISF vessel. [District Rule 4409] Federally Enforceable Through Title V Permit
18. Permittee shall maintain records of number and type of components installed and calculated fugitive emissions. Permittee shall update such records when new components are installed. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070]

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

DRAFT

**ATTACHMENT B**  
Authorities to Construct  
(S-1216-64-4, '158-0 and '159-0)



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-1216-64-4

**ISSUANCE DATE:** 03/09/2011

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

**LOCATION:** LIGHT OIL WESTERN

**SECTION:** NE 23 **TOWNSHIP:** 30S **RANGE:** 22E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 3,000 BBL FIXED ROOF WASH TANK SERVED BY A VAPOR CONTROL SYSTEM SHARED WITH S-1216-66, '-72, '-73, '-74 & '-75: CONNECT INDUCED GAS FLOTATION VESSELS S-1216-158 AND '159 TO VAPOR CONTROL

### CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
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 the reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.7. [District Rule 4623]
3. The tank shall be equipped with a fixed roof with no holes or openings. [District Rule 2201]
4. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District Rule 4623]
5. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623]
6. Tank roof appurtenances shall be maintained leak free. [District Rule 4623]

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

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 ppmv, above background, as measured by a portable hydrocarbon detection instrument 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. A reading in excess of 10,000 ppmv above background or the dripping of organic liquid at a rate of more than 3 drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623]
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 Rule 4623, 5.7 (Table 3)]
9. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, 5.7 (Table 3)]
10. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) eliminate or minimize the leak within 8 hours after detection, (b) if the leak can not 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 detection. In no event shall the total time to minimize and eliminate the leak exceed 56 hours after detection. [District Rule 4623, 5.7.9 (Table 3)]
11. If a component type for a given tank is found to leak during an annual inspection, then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, then revert to annual inspections. [District Rule 4623, 5.7 (Table 3)]
12. 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 Rule 1070]
13. The efficiency of any VOC destruction device shall be measured by EPA Method 25, 25a, or 25b. [District Rule 4623, 6.4.7]
14. Except as otherwise provided in this permit, operator shall ensure that the vapor control system is functional and is operating as designed at all times. [District Rules 4623 and 2201]
15. VOC emission rate from vapor, light liquid, and light crude oil components associated with vapor recovery piping shall not exceed 0.3 lb/day. [District Rule 2201]
16. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance but occurs as a routine maintenance activity. [District Rule 2020]
17. Permittee shall keep in their facility at all times a copy of the letter sent to the APCO requesting participation in the Rule 4623 Fixed Roof Tank Preventive Inspection and Maintenance Program, and Tank Interior Cleaning Program, and maintain the records of annual tank inspections, maintenance, and cleaning to document the participation in the program. [District Rule 4623, 5.7]
18. Permittee shall comply with all applicable Tank Interior Cleaning Program requirements specified in Table 6 of Rule 4623. [District Rule 4623, 5.7]
19. Permittee shall maintain accurate records of fugitive emissions and such records shall be made readily available for District inspection upon request for a period of five years. [District Rule 2201]
20. All records shall be maintained for a period of at least five years and made available for District inspection upon request. [District Rule 1070]
21. Formerly S-3506-1-0.
22. Formerly S-1641-69.
23. Formerly S-382-798.



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-1216-158-0

**ISSUANCE DATE:** 03/09/2011

**LEGAL OWNER OR OPERATOR:** OCCIDENTAL OF ELK HILLS INC

**MAILING ADDRESS:** 10800 STOCKDALE HIGHWAY  
BAKERSFIELD, CA 93311

**LOCATION:** LIGHT OIL WESTERN

**EQUIPMENT DESCRIPTION:**

INDUCED GAS FLOATATION VESSEL SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-1216-64

### CONDITIONS

1. Tank shall vent only to vapor control system listed on S-1216-64. [District Rule 2201]
2. All 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, 5.3.2]
3. All piping, valves, and fittings shall be constructed and maintained in a Leak-Free condition. [District Rules 2201 and 4623, 5.6.3]
4. 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 ppmv, above background, as measured by a portable hydrocarbon detection instrument 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. A reading in excess of 10,000 ppmv above background or the dripping of organic liquid at a rate of more than 3 drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623]
5. VOC fugitive emissions from the components in gas and light oil service from the ISF vessel to the vapor control system trunk line shall not exceed 0.21 lb/day. [District Rule 2201]
6. Fugitive VOC emissions rate shall be 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]

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

7. All piping, fittings, and valves on this ISF vessel 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. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, 5.7 (Table 3)]
8. If any of the ISF vessel components are found to be leaking, operator shall immediately affix a tag and maintain records of liquid leak and gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, 5.7 (Table 3)]
9. 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 4623, 5.7 (Table 3)]
10. Operator shall comply with the following requirements to repair leaking components that have a gas leak >10,000 ppmv (measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane): a. Eliminate the leak within 8 hours after detection; or b. If the leak can not be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices; and c. Eliminate the leak within 48 hours after minimization; and d. In no event that the total time to minimize and eliminate the leak shall exceed 56 hours after detection. [District Rules 4623, 5.7 (Table 3)]
11. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the specified timeframes, shall not constitute a violation of the District Rule 4623 (amended May 19, 2005). However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified timeframes, shall constitute a violation of the District Rule 4623 (amended May 19, 2005). [District Rule 4623, 5.7 (Table 3)]
12. If a component type for a given tank is found to leak during an annual inspection, operator shall then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, operator shall then revert to annual inspections. [District Rule 4623, 5.7 (Table 3)]
13. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623 (amended May 19, 2005), even if it is under the voluntary inspection and maintenance program. [District Rule 4623, 5.7 (Table 3)]
14. Permittee shall keep in their facility at all times a copy of the letter sent to the APCO requesting participation in the Rule 4623 Fixed Roof Tank Preventive Inspection and Maintenance Program, and Tank Interior Cleaning Program, and maintain the records of annual tank inspections, maintenance, and cleaning to document the participation in the program. [District Rule 4623, 5.7]
15. Permittee shall comply with all applicable Tank Interior Cleaning Program requirements specified in Section 5.7 of Rule 4623. [District Rule 4623, 5.7]
16. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date 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 Rule 1070]
17. The permittee shall keep accurate records of the API gravity of each organic liquid stored in the ISF vessel. [District Rule 4409]
18. Permittee shall maintain records of number and type of components installed and calculated fugitive emissions. Permittee shall update such records when new components are installed. [District Rule 2201]
19. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070]
20. ATC S-1216-64-4 shall be implemented prior to or concurrently with this ATC. [District Rule 2201]



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-1216-159-0

**ISSUANCE DATE:** 03/09/2011

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

**LOCATION:** LIGHT OIL WESTERN

**EQUIPMENT DESCRIPTION:**  
INDUCED GAS FLOATION VESSEL SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-1216-64

### CONDITIONS

1. Tank shall vent only to vapor control system listed on S-1216-64. [District Rule 2201]
2. All 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, 5.3.2]
3. All piping, valves, and fittings shall be constructed and maintained in a Leak-Free condition. [District Rules 2201 and 4623, 5.6.3]
4. 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 ppmv, above background, as measured by a portable hydrocarbon detection instrument 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. A reading in excess of 10,000 ppmv above background or the dripping of organic liquid at a rate of more than 3 drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623]
5. VOC fugitive emissions from the components in gas and light oil service from the ISF vessel to the vapor control system trunk line shall not exceed 0.21 lb/day. [District Rule 2201]
6. Fugitive VOC emissions rate shall be 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]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

7. All piping, fittings, and valves on this ISF vessel 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. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, 5.7 (Table 3)]
8. If any of the ISF vessel components are found to be leaking, operator shall immediately affix a tag and maintain records of liquid leak and gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, 5.7 (Table 3)]
9. 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 4623, 5.7 (Table 3)]
10. Operator shall comply with the following requirements to repair leaking components that have a gas leak >10,000 ppmv (measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane): a. Eliminate the leak within 8 hours after detection; or b. If the leak can not be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices; and c. Eliminate the leak within 48 hours after minimization; and d. In no event that the total time to minimize and eliminate the leak shall exceed 56 hours after detection. [District Rules 4623, 5.7 (Table 3)]
11. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the specified timeframes, shall not constitute a violation of the District Rule 4623 (amended May 19, 2005). However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified timeframes, shall constitute a violation of the District Rule 4623 (amended May 19, 2005). [District Rule 4623, 5.7 (Table 3)]
12. If a component type for a given tank is found to leak during an annual inspection, operator shall then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, operator shall then revert to annual inspections. [District Rule 4623, 5.7 (Table 3)]
13. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623 (amended May 19, 2005), even if it is under the voluntary inspection and maintenance program. [District Rule 4623, 5.7 (Table 3)]
14. Permittee shall keep in their facility at all times a copy of the letter sent to the APCO requesting participation in the Rule 4623 Fixed Roof Tank Preventive Inspection and Maintenance Program, and Tank Interior Cleaning Program, and maintain the records of annual tank inspections, maintenance, and cleaning to document the participation in the program. [District Rule 4623, 5.7]
15. Permittee shall comply with all applicable Tank Interior Cleaning Program requirements specified in Section 5.7 of Rule 4623. [District Rule 4623, 5.7]
16. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date 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 Rule 1070]
17. The permittee shall keep accurate records of the API gravity of each organic liquid stored in the ISF vessel. [District Rule 4409]
18. Permittee shall maintain records of number and type of components installed and calculated fugitive emissions. Permittee shall update such records when new components are installed. [District Rule 2201]
19. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070]
20. ATC S-1216-64-4 shall be implemented prior to or concurrently with this ATC. [District Rule 2201]

# ATTACHMENT C

## Emissions Increases

SSIPE (lb/yr)				
NOx	VOC	CO	SOx	PM10
0	154	0	0	0

**ATTACHMENT D**  
Previous Title V Operating Permit  
S-1216-64-3

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1216-64-3

**EXPIRATION DATE:** 08/31/2016

**SECTION:** NE 23 **TOWNSHIP:** 30S **RANGE:** 22E

**EQUIPMENT DESCRIPTION:**

3,000 BBL FIXED ROOF WASH TANK SERVED BY A VAPOR CONTROL SYSTEM SHARED WITH S-1216-66, '-72, '-73, '-74 & '-75

## PERMIT UNIT REQUIREMENTS

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1. The tank shall be maintained in a leak-free condition and equipped with an APCO approved vapor recovery system consisting of a closed 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 a leak-free condition. The VOC control device shall be one of the following: a condensation or vapor recovery system that connects to a gas processing plant, a field gas pipeline, a pipeline distributing PUC quality gas for sale, an injection well for disposal of vapors, or a VOC control 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. The tank shall be equipped with a fixed roof with no holes or openings. [District NSR Rule] Federally Enforceable Through Title V Permit
3. 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
4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit
5. The control efficiency of any VOC destruction device, measured and calculated as carbon, shall be determined by US EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case US EPA Method 25a may be used. US EPA Method 18 may be used in lieu of US EPA Method 25 or US 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 the known analytes/compounds to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4623] Federally Enforceable Through Title V Permit
6. Except as otherwise provided in this permit, operator shall ensure that the vapor control system is functional and is operating as designed at all times. [District NSR Rule and 4623] Federally Enforceable Through Title V Permit
7. VOC emission rate from vapor, light liquid, and light crude oil components associated with vapor recovery piping shall not exceed 0.3 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The tank shall comply with the voluntary inspection and maintenance program requirements of conditions 99 through 107 of the Facility-Wide Permit S-1216-0-1. [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.

9. 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 Rule 4623] Federally Enforceable Through Title V Permit
10. This tank shall be degassed before commencing interior cleaning by following one of the following options: 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, or 2) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system 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
11. 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
12. 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 Rule 4623] Federally Enforceable Through Title V Permit
13. 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
14. 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
15. 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
16. Tank 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
17. 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
18. Permittee shall only transport removed sludge in closed, liquid leak-free containers. [District Rule 4623] Federally Enforceable Through Title V Permit
19. 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
20. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [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.

21. Formerly S-3506-1-0.
22. Formerly S-1641-69.
23. Formerly S-382-798.

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

# ATTACHMENT E

## Application

OCCIDENTAL OF ELK HILLS, INC.  
10800 Stockdale Highway Bakersfield, California 93311  
Telephone 661 412-5000

RECEIVED

JUL 10 2012

SJVAPCD  
Southern Region

July 10, 2012

Mr. Leonard Scandura  
Permit Services Manager  
San Joaquin Valley APCD – Southern Region  
34946 Flyover Court  
Bakersfield, CA 93308

Subject: Minor Modification to Occidental of Elk Hills, Inc.  
Title V Permit (S-1216)

Dear Mr. Scandura:

Occidental of Elk Hills, Inc. (OEHI) requests District approval for a Minor Modification of facility S-1216 Title V Permit to include the below listed Authorities to Construct:

S-1216-64-4    S-1216-158-0    S-1216-159-0

Please bill OEHI for all administrative costs associated with this request. If you have any questions or require addition information concerning this issue, please contact me directly at (661) 412-5263 or on my cellular phone at (661) 204-9236.

Sincerely,



Raymond Rodriguez  
Sr. Environmental Advisor  
Occidental of Elk Hills, Inc.

Cc: Mike Glavin, OEHI  
Kevin Madry, ERM

# San Joaquin Valley Air Pollution Control District

[www.valleyair.org](http://www.valleyair.org)

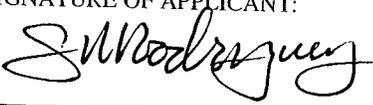
RECEIVED

JUL 10 2012

SJVAPCD  
Southern Region

## Permit Application For:

ADMINISTRATIVE AMENDMENT     MINOR MODIFICATION     SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">Occidental of Elk Hills, Inc</p>	
2. MAILING ADDRESS:  STREET/P.O. BOX: <u>10800 Stockdale Hwy</u> CITY: <u>Bakersfield</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93311</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:  STREET: <u>Elk Hills</u> CITY: <u>Tupman</u>  ¼ SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: <u>Oil and Natural Gas Production</u>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)  <u>Incorporate the following ATCs into S-1216 Title V Permit:</u>  <u>S-1216-64-4    S-1216-158-0    S-1216-159-0</u>	
6. TYPE OR PRINT NAME OF APPLICANT: <p style="text-align: center;"><u>Raymond Rodriguez</u></p>	TITLE OF APPLICANT: <p style="text-align: center;"><u>Sr. Environmental Advisor</u></p>
7. SIGNATURE OF APPLICANT: 	DATE: <u>July 10, 2012</u>  PHONE: <u>(661) 412-5263</u> FAX: <u>(661) 412-5270</u> EMAIL: <u>Raymond_rodriguez@oxy.com</u>

**For APCD Use Only:**

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____  DATE PAID: _____  PROJECT NO: <u>S-1122691</u> FACILITY ID: <u>S-1216</u>
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*Title V - Minor Mod*

San Joaquin Valley  
Unified Air Pollution Control District

RECEIVED

JUL 10 2012

SJVAPCD  
Southern Region

**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM**

**I. TYPE OF PERMIT ACTION (Check appropriate box)**

- SIGNIFICANT PERMIT MODIFICATION                       ADMINISTRATIVE AMENDMENT  
 MINOR PERMIT MODIFICATION

COMPANY NAME: Occidental of Elk Hills, Inc	FACILITY ID: S - 1216
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: Occidental of Elk Hills, Inc	
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 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:

Armando G. Gonzalez  
Signature of Responsible Official

July 10, 2012

Date

Armando Gonzalez

\_\_\_\_\_  
Name of Responsible Official (please print)

Health, Environmental, Safety & Security Manager

\_\_\_\_\_  
Title of Responsible Official (please print)