



MAR 05 2013

David Bone  
Chevron USA, Inc  
P. O Box 1392  
Bakersfield, CA 93302

**Re: Notice of Minor Title V Permit Modification  
District Facility # S-1129  
Project # S-1120206**

Dear Mr. Bone:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. Your proposal for a Title V minor permit modification to incorporate comments made on your renewed Title V permit issued on January 31, 2012 under project S-1063774. Modifications were made to renewed Title V permits S-1129-0-3, -112-6, -115-6, and -385-12.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Title V permits S-1129-0-3, -112-6, -115-6, and -385-12, and facility comments/Districts response. 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. Jim Swaney at (559) 230-5900.

Sincerely,

David Warner  
Director of Permit Services

Enclosures

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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

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

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



MAR 05 2013

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-1129**  
**Project # S-1120206**

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Chevron USA, Inc is proposing a Title V minor permit modification to incorporate comments made on their renewed Title V permit issued on January 31, 2012 under project S-1063774. Modifications were made to renewed Title V permits S-1129-0-3, -112-6, -115-6, and -385-12.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Title V permits S-1129-0-3, -112-6, -115-6, and -385-12, and facility comments/Districts response. 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. Jim Swaney at (559) 230-5900.

Sincerely,

David Warner  
Director of Permit Services

Enclosures

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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

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

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

# **TITLE V APPLICATION REVIEW**

Minor Modification  
Project #: S-1120206

Engineer: Vanesa Gonzalez  
Date: January 31, 2012

Facility Number: S-1129  
Facility Name: Chevron USA  
Mailing Address: P O Box 1392  
Bakersfield, CA 93302

Contact Name: Dave Bone  
Phone: (661) 654-7150

Responsible Official: Art Lewis  
Title: Operations Manager

---

## **I. PROPOSAL**

Chevron USA, Inc is proposing a Title V minor permit modification to incorporate comments made on their renewed Title V permit issued on January 31, 2012 under project S-1063774. This minor modification application review will only address changes to the renewed permits as a result of the facility comments. See Attachment C for a complete discussion of Chevron's comments and Districts response.

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**

Light Oil Source at Elk Hills (Elk Hills Oil & Gas Field)  
NE/4 Section 35 Township 31S Range 23E

## **III. EQUIPMENT DESCRIPTION**

S-1129-0-3: FACILITY WIDE REQUIREMENTS

S-1129-112-10: 5.4 MMBTU/HR GAS-FIRED HEATER TREATER WITH THREE BURNERS EACH RATED AT 1.8 MMBTU/HR - NORTH MIDWAY

S-1129-115-10: 7.4 MMBTU/HR GAS-FIRED HEATER TREATER WITH THREE BURNERS EACH RATED AT 1.8 MMBTU/HR AND ONE BURNER RATED AT 2.0 MMBTU/HR - NORTH MIDWAY

S-1129-385-15: THERMALLY ENHANCED OIL RECOVERY OPERATION WITH WELL VENT VAPOR COLLECTION PIPING NETWORK AND FLARE SERVING 40 OIL PRODUCTION WELLS (MCKITTRICK OILFIELD)

**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**

**S-1129-0-3: FACILITY WIDE REQUIREMENTS**

Condition 24 requires architectural coatings subject to District Rule 4601 to be stored in closed containers when not in use. This condition has been modified to include activities that are considered "in use" by the District. Such activities include but are not limited to the containers being accessed, filled, emptied, maintained or repaired.

Condition 46 has been modified to allow the facility 45 days to submit the facilities annual Report of Required Monitoring and the Compliance Certification.

**S-1129-112-10: 5.4 MMBTU/HR GAS-FIRED HEATER TREATER WITH THREE BURNERS EACH RATED AT 1.8 MMBTU/HR - NORTH MIDWAY**

Condition 13 has been revised to add EPA Method 11 or 15, ASTM D 6288, and Double GC to test methods for determining sulfur content of noncertified gaseous fuel.

**S-1129-115-10: 7.4 MMBTU/HR GAS-FIRED HEATER TREATER WITH THREE BURNERS EACH RATED AT 1.8 MMBTU/HR AND ONE BURNER RATED AT 2.0 MMBTU/HR - NORTH MIDWAY**

Condition 13 has been revised to add EPA Method 11 or 15, ASTM D 6288, and Double GC to test methods for determining sulfur content of noncertified gaseous fuel.

**S-1129-385-15: THERMALLY ENHANCED OIL RECOVERY OPERATION WITH WELL VENT VAPOR COLLECTION PIPING NETWORK AND FLARE SERVING 40 OIL PRODUCTION WELLS (MCKITTRICK OILFIELD)**

Condition 21 has been revised to add EPA Method 11 or 15, ASTM D 6288, and Double GC to test methods for determining sulfur content of noncertified gaseous fuel.

## **VII. COMPLIANCE**

In accordance with Rule 2520, 3.20, these modifications:

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

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

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

## **VIII. ATTACHMENTS**

- A. Proposed Modified Title V Operating Permit No. S-1129-0-3, -112-10, -115-10, and -385-15
- B. Current Title V Operating Permit No.'s S-1129-0-2, -112-6, -115-6, and -385-12
- C. Facility Comments/District Response

# ATTACHMENT A

Proposed Modified Title V Operating Permit No.  
(S-1129-0-3, -112-10, -115-10, and -385-15)

# San Joaquin Valley Air Pollution Control District

FACILITY: S-1129-0-3

EXPIRATION DATE: 02/29/2016

## FACILITY-WIDE REQUIREMENTS

1. {4362} The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. {4363} The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. {4364} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. {4365} Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. {4366} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. {4368} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

9. {4370} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. {4371} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. {4373} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. {4374} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. {4375} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. {4376} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. {4377} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. {4378} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. {4379} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. {4380} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. {4381} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. {4382} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

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

22. {4383} No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
23. {4384} No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. In use includes, but is not limited to: being accessed, filled, emptied, maintained or repaired. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. {4386} The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. {4387} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. {4388} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. {4389} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. {4390} Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. {4391} Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. {4392} An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. {4393} Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. {4394} Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit

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

34. {4395} Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. {4396} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
36. {4397} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. {4398} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permit shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. {4400} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. {4401} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. {118} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. All permits for facilities S-1128, S-1129, S-1141, S-1549, and S-2592 are included in the Chevron USA, Inc. Heavy Oil Western stationary source. [District Rule 2201] Federally Enforceable Through Title V Permit
43. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
44. For vapor recovery systems connected to tanks with pressure relief valves, operator shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
45. For tanks equipped with pressure relief valves, operator shall inspect pressure relief valves for fugitive leaks annually in accordance with EPA Method 21, with the instrument calibrated with methane. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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

46. On June 30, 2002, the initial Title V permit was issued, the reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin July 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 45 days of the end of reporting period. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

DRAFT

# ATTACHMENT B

Current Title V Operating Permit No.'s  
S-1129-0-2, -112-6, -115-6, and -385-12

# San Joaquin Valley Air Pollution Control District

FACILITY: S-1129-0-2

EXPIRATION DATE: 02/29/2016

## FACILITY-WIDE REQUIREMENTS

---

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

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

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permit shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. All permits for facilities S-1128, S-1129, S-1141, S-1549, and S-2592 are included in the Chevron USA, Inc. Heavy Oil Western stationary source. [District NSR Rule] Federally Enforceable Through Title V Permit
43. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
44. For vapor recovery systems connected to tanks with pressure relief valves, operator shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
45. For tanks equipped with pressure relief valves, operator shall inspect pressure relief valves for fugitive leaks annually in accordance with EPA Method 21, with the instrument calibrated with methane. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
46. On June 30, 2002, the initial Title V permit was issued, the reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin July 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days of the end of reporting period. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1129-112-6

**EXPIRATION DATE:** 02/29/2016

**SECTION:** NW02 **TOWNSHIP:** 31S **RANGE:** 22E

**EQUIPMENT DESCRIPTION:**

5.4 MMBTU/HR GAS-FIRED HEATER TREATER WITH THREE BURNERS EACH RATED AT 1.8 MMBTU/HR - NORTH MIDWAY

## PERMIT UNIT REQUIREMENTS

---

1. Maximum annual heat input of the unit shall be less than 9 billion Btu per calendar year. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
2. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
3. Owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rule 4306] Federally Enforceable Through Title V Permit
4. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rule 4306] Federally Enforceable Through Title V Permit
5. The permittee shall monitor, at least on a monthly basis, fluid temperature and fluid interface level or other operational characteristics recommended by the unit manufacturer. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
6. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Last Amended December 16, 1993). [District Rule 1081, and Kern County Rule 108.1] Federally Enforceable Through Title V Permit
7. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel sources, and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. 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 2520, 9.4.2] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO<sub>2</sub>, nor 10 lb/hr. Firing on PUC or FERC quality natural gas shall demonstrate compliance with this requirement. [District Rules 4201, 3.1; 4301, 5.1 & 5.2.3; and 4320, 5.4] 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. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas; or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rule 2520, 9.3.2 and District Rule 4301, 5.2.1] Federally Enforceable Through Title V Permit
11. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume until compliance with the sulfur limits can be demonstrated for 8 consecutive weeks for a fuel source. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. When complying with SO<sub>x</sub> emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6, 6A, 6B, 6C, Method 8 or ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. If the unit is fired on noncertified gaseous fuel and compliance with SO<sub>x</sub> emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. If fuel analysis is used to demonstrate compliance with conditions of this permit, the fuel higher heating value for each fuel shall be certified by a third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. Excess combustion air shall be maintained at no less than 10% unless continuous operation oxygen analyzer/controller is utilized. [District Rule 2080] Federally Enforceable Through Title V Permit
16. Heater treater shall be fired exclusively on natural gas or LPG and shall have no provisions for firing on fuel oil. [District Rules 2080 and 4301, 5.2.2] Federally Enforceable Through Title V Permit
17. Records of monthly and annual heat input of the unit shall be maintained. [District Rules 2201, 4305, 4306, and 4320, 6.0] Federally Enforceable Through Title V Permit
18. Records of tune-up and monitoring of the operational characteristics of the unit shall be maintained. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
19. 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, and 4306] Federally Enforceable Through Title V Permit
20. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NO<sub>x</sub> emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NO<sub>x</sub> emission limit listed in Rule 4320. [District Rule 4320, 5.3] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1129-115-6

**EXPIRATION DATE:** 02/29/2016

**SECTION:** NW02 **TOWNSHIP:** 31S **RANGE:** 22E

**EQUIPMENT DESCRIPTION:**

7.4 MMBTU/HR GAS-FIRED HEATER TREATER WITH THREE BURNERS EACH RATED AT 1.8 MMBTU/HR AND ONE BURNER RATED AT 2.0 MMBTU/HR - NORTH MIDWAY

## PERMIT UNIT REQUIREMENTS

---

1. Maximum annual heat input of the unit shall be less than 9 billion Btu per calendar year. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
2. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
3. Owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rule 4306] Federally Enforceable Through Title V Permit
4. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rule 4306] Federally Enforceable Through Title V Permit
5. The permittee shall monitor, at least on a monthly basis, fluid temperature and fluid interface level or other operational characteristics recommended by the unit manufacturer. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
6. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (Last Amended December 16, 1993). [District Rule 1081, and Kern County Rule 108.1] Federally Enforceable Through Title V Permit
7. Copies of all gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted, fuel sources, and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. 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 2520, 9.4.2] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO<sub>2</sub>, nor 10 lb/hr. Firing on PUC or FERC quality natural gas shall demonstrate compliance with this requirement. [District Rules 4201, 3.1; 4301, 5.1 and 5.2.3; and 4320, 5.4] 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. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO<sub>2</sub>. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas; or by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rule 2520, 9.3.2 and District Rule 4301, 5.2.1] Federally Enforceable Through Title V Permit
11. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume until compliance with the sulfur limits can be demonstrated for 8 consecutive weeks for a fuel source. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. When complying with SO<sub>x</sub> emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6, 6A, 6B, 6C, Method 8 or ARB Method 1-100; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. If the unit is fired on noncertified gaseous fuel and compliance with SO<sub>x</sub> emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. If fuel analysis is used to demonstrate compliance with conditions of this permit, the fuel higher heating value for each fuel shall be certified by a third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. Excess combustion air shall be maintained at no less than 10% unless continuous operation oxygen analyzer/controller is utilized. [District Rule 2080] Federally Enforceable Through Title V Permit
16. Heater treater shall be fired exclusively on natural gas or LPG and shall have no provisions for firing on fuel oil. [District Rules 2080 and 4301, 5.2.2] Federally Enforceable Through Title V Permit
17. Records of monthly and annual heat input of the unit shall be maintained. [District Rules 2201, 4305, 4306, and 4320, 6.0] Federally Enforceable Through Title V Permit
18. Records of tune-up and monitoring of the operational characteristics of the unit shall be maintained. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
19. 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, and 4306] Federally Enforceable Through Title V Permit
20. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NO<sub>x</sub> emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NO<sub>x</sub> emission limit listed in Rule 4320. [District Rule 4320, 5.3] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1129-385-12

**EXPIRATION DATE:** 02/29/2016

**SECTION:** SW17 **TOWNSHIP:** 30S **RANGE:** 22E

**EQUIPMENT DESCRIPTION:**

THERMALLY ENHANCED OIL RECOVERY OPERATION WITH WELL VENT VAPOR COLLECTION PIPING NETWORK AND FLARE SERVING 40 OIL PRODUCTION WELLS (MCKITTRICK OILFIELD)

## PERMIT UNIT REQUIREMENTS

---

1. The crude oil production from wells associated with this permit unit shall not lie within 1000 feet of an air injection well used for in-situ combustion. [District Rule 4407, 2.0, 3.4, and 3.5] Federally Enforceable Through Title V Permit
2. All required source testing shall conform to the compliance testing procedures described in District Rule 1081(as amended December 16, 1993). [District Rule 1081 and Kern County Rule 108.1] Federally Enforceable Through Title V Permit
3. Well casing vents or downstream valves may be closed if wells are producing to tanks equipped with 99% vapor control or if the wells are idle. [District Rules 2201 and 4401, 5.4] Federally Enforceable Through Title V Permit
4. Fugitive VOC emissions from TEOR system including condensate collection and handling shall not exceed 29.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Fugitive VOC limit listed above does not include components at the well-head up to the point of initial gas/liquid separation, or existing production handling or flow measurement facilities, or shown to be handling produced fluids with an API gravity less than 30 degrees or fluid streams containing more than 50% water (by weight) or with a VOC content of 10% (by weight) or less. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Components to be screened and counted for determining compliance with fugitive VOC limit listed above shall be identified and categorized according to the appropriate fluid types (gas or water/oil) in Table 2-4 of the EPA's "1995 Protocol for Equipment Leak Emission Estimates" (EPA-453/R-95-017) and the following component types: valves, fittings, threaded connections, open-ended lines, pumps, compressors, pressure relief devices, pipes, flanges, process drains, sealing mechanisms, hatches, sight-glasses, meters, or seal fluid systems. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The VOC content of the casing gas shall not exceed 25% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Maximum amount of gas combusted in flare shall not exceed 21.6 MMBtu/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from the flare shall not exceed any of the following limits (based on total gas combusted): NOx (as NO2): 0.068 lb/MMBtu; PM10: 0.008 lb/MMBtu; CO: 0.37 lb/MMBtu; or VOC: 0.063 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Sulfur emissions from flare shall not exceed 49.4 lb SO2/day. [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.

11. Operator shall conduct quarterly sampling of the well casing gas. If the gas sampled is 25% or less VOC by weight for eight consecutive quarterly samplings, the sampling frequency shall only be required annually. If a test shows noncompliance with the percent VOC requirement, the source must return to quarterly testing until eight consecutive quarters show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The higher heating value of the flared gas shall be monitored at least quarterly. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
13. Measured heating value and quantity of gas flared shall be used to determine compliance with heat input limit. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The flare shall be operated according to the manufacturer's specifications, a copy of which shall be maintained on site. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. Operation shall include condenser vessel, air-cooled heat exchanger, 500 barrel condensate vessel and 0.9 MMBtu/hr Sur-Lite Model 20 SLF enclosed flare. [District Rule 2201] Federally Enforceable Through Title V Permit
16. A flame shall be present at all times when combustible gases are vented through the flare. [District Rule 4311, 5.2] Federally Enforceable Through Title V Permit
17. All vapors from condenser shall be incinerated in flare. [District Rule 2201] Federally Enforceable Through Title V Permit
18. A flame or heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present shall be operational. [District Rule 4311, 5.4] Federally Enforceable Through Title V Permit
19. Flame temperature of the flare shall be greater than 1200 degrees F or another temperature established during source testing which documents compliance with all emission limits. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Flare shall be equipped with operational fuel meters to measure quantity of PUC quality makeup gas and TEOR gas incinerated. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
21. If the flare is fired on noncertified gaseous fuel (including TEOR gas) and compliance with SO<sub>x</sub> emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
22. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source (including TEOR gas) shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume until compliance with the sulfur limits can be demonstrated for 8 consecutive weeks for a fuel source. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. Sulfur content of the combusted gas shall be determined using ASTM test methods D-1072, D-3246, D-6228, or double GC for H<sub>2</sub>S and Mercaptans. H<sub>2</sub>S concentration (ppmv) of the gas shall be determined using ASTM test methods D-1072 or D-4084, using Draeger tube, or by gas supplier test data consistent with the natural gas fuel sulfur content test method listed in this permit. [District Rule 1081] Federally Enforceable Through Title V Permit
24. Source test results shall be submitted to the District within 60 days after collection. [District Rule 1081] Federally Enforceable Through Title V Permit
25. The operator shall maintain a copy of the latest APCO-approved Operator Management Plan (OMP) at the facility and make it available to the APCO, ARB, and US EPA upon request. [District Rule 4401, 6.1.8] Federally Enforceable Through Title V Permit
26. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4401, 6.7] 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.

27. In accordance with the approved OMP, the operator shall meet all applicable operating, inspection and re-inspection, maintenance, component identification, record keeping, and notification requirements of Rule 4401 for all steam enhanced crude oil production wells at this facility except for those wells and components specifically exempted in Section 4.0 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
28. The operator shall maintain an inspection log that has been signed and dated by the facility operator responsible for the inspection, certifying the accuracy of the information recorded in the log. The inspection log shall contain, at a minimum, all of the following information: 1) The total number of components inspected, and the total number and percentage of leaking components found by component types; 2) The location, type, name or description of each leaking component and the description of any unit where the leaking component is found; 3) Date of the leak detection and method of the leak detection; 4) For gaseous leaks, record the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak; 5) The date of repair, replacement, or removal from operation of the leaking component(s); 6) The identification and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes first; 7) The method(s) used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier; 8) The date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced; 9) The inspector's name, business mailing address, and business telephone number. [District Rule 4401, 6.4] Federally Enforceable Through Title V Permit
29. Steam-enhanced crude oil production well vents shall be closed, except when temporarily opened during periods of attended service or repair of the well provided such activity is done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere, and the front line production equipment downstream of the wells that carry produced fluids be connected to a VOC collection and control system. Alternatively, steam-enhanced crude oil production well vents shall be open and the well vents connected to a VOC collection and control system. [District Rule 4401, 5.5.1] Federally Enforceable Through Title V Permit
30. The operator shall be in violation of Rule 4401 if any District inspection, or operator inspection conducted as a requirement of this rule, demonstrates that one or more of the leak standard conditions set forth in section 5.6.2 exists. [District Rule 4401, 5.6.1] Federally Enforceable Through Title V Permit
31. There shall not be an open-ended line or a valve located at the end of the line that is not sealed with a blind flange, plug, cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended lines. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401, 5.6.2.1] Federally Enforceable Through Title V Permit
32. For pressure relief devices (PRDs) a major gas leak is greater than 10,000 ppmv and a minor gas leak is from 400 to 10,000 ppmv. For components other than PRDs a major gas leak is greater than 10,000 ppmv and a minor gas leak is from 2,000 to 10,000 ppmv. A major liquid leak is a visible mist or a continuous flow of liquid that is not seal lubricant. A minor liquid leak is a liquid leak, except seal lubricant, that is not a major liquid leak and drips liquid at a rate of more than three drops per minute. Any liquid or gas coming from a component undergoing repair or replacement, or during sampling of process fluid from a component into a container is not considered a leak provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401, 3.20] Federally Enforceable Through Title V Permit
33. There shall be no components with major liquid leaks or with gas leaks greater than 50,000 ppmv. [District Rule 4401, 5.6.2.2 and 5.6.2.3] Federally Enforceable Through Title V Permit
34. There shall not be more minor liquid leaks, minor gas leaks, or gas leaks greater than 10,000 ppmv up to 50,000 ppmv than the following: 3 leaks for 1 - 25 wells, 6 leaks for 26 - 50 wells, 8 leaks for 51 - 100 wells, 10 leaks for 101 - 250 wells, 15 leaks for 251 - 500 wells, and 1 leak for each 20 wells (with a minimum of 50 wells test) for more than 500 wells connected to a VOC collection and control system. [District Rule 4401, 5.6.2.4] 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.

35. Components that have been found leaking in excess of the applicable leak standards of this rule may be used provided such leaking components have been identified with a tag for repair, are repaired, or are awaiting re-inspection after being repaired, within the applicable time period specified in this permit. [District Rule 4401, 5.7.1] Federally Enforceable Through Title V Permit
36. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401, 5.7.2] Federally Enforceable Through Title V Permit
37. Except for pipes and unsafe-to-monitor components, all other components shall be inspected pursuant to the requirements of section 6.3.3 at least once every year. [District Rule 4401,5.8.1] Federally Enforceable Through Title V Permit
38. All pipes shall be visually inspected at least once every year. Any visual inspection of pipes that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected within 24 hours after detecting the leak. If a leak is found, the leak shall be repaired as soon as practicable but not later than as allowed by Rule 4401 and specified in this permit. [District Rule 4401, 5.8.2] Federally Enforceable Through Title V Permit
39. The operator shall audio-visually (by hearing and by sight) inspect for leaks all accessible operating pumps, compressors, and PRDs in service at least once each calendar week. [District Rule 4401, 5.8.3.1] Federally Enforceable Through Title V Permit
40. Any audio-visual inspection of an accessible operating pump, compressor, and PRD performed by an operator that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected not later than 24 hours after conducting the audio-visual inspection. If a leak is found, the leak shall be repaired as soon as practicable but not later than as allowed by Rule 4401 and specified in this permit. [District Rule 4401, 5.8.3.2] Federally Enforceable Through Title V Permit
41. The operator shall initially inspect a PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the discovery of the release. The operator shall re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection. [District Rule 4401, 5.8.4.1] Federally Enforceable Through Title V Permit
42. The operator shall inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. The operator shall inspect a component, other than PRDs, that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. The operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401, 5.8.4.2, 5.8.4.3, 5.8.5] Federally Enforceable Through Title V Permit
43. A District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. [District Rule 4401, 5.8.6] Federally Enforceable Through Title V Permit
44. The operator, upon detection of a leaking component, shall affix to that component a weatherproof, readily visible tag, bearing the date and time when the leak was detected and the date and time of the leak measurement. For gaseous leaks, the tag shall indicate the leak concentration in ppmv. For liquid leaks, the tag shall indicate whether it is a major liquid leak or a minor liquid leak. The tag shall indicate, when applicable, whether the component is an essential component, an unsafe-to-monitor component, or a critical component. The tag shall remain in place until the leaking component is repaired or replaced and reinspected and found to be in compliance with the requirements of this rule. [District Rule 4401 5.9.1, 5.9.2] 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.

45. The operator shall minimize all component leaks immediately, to the extent possible, but not later than one hour after detection of the leak in order to stop or reduce leakage to the atmosphere. Except for leaking critical components or leaking essential components, if the leak has been minimized but the leak still exceeds the applicable leak standards specified in this permit, the operator shall do one of the following within the timeframes specified within this permit: 1) repair or replace the leaking component; 2) vent the leaking component to a closed vent system; 3) or remove the leaking component from operation. A closed vent system is a District approved system that is not open to the atmosphere. It is composed of hard-piping, ductwork connections and, if necessary, flow inducing devices that transport gas or vapor from a piece or pieces of equipment to a District approved control device that has a overall VOC collection and destruction or removal efficiency of at least 99%, or that transports gases or vapors back to a process system. [District Rule 4401, 5.9.3, 5.9.4] Federally Enforceable Through Title V Permit
46. The operator shall repair minor gas leaks within 14 days, major gas leaks which less than or equal to 50,000 ppmv within 5 days., major gas leaks which are greater than 50,000 ppmv within two days, minor liquid leaks within 3 days, and major liquid leaks within 2 days. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period. The start of the repair period shall be the time of the initial leak detection. [District Rule 4401, 5.9.4, 5.9.5, and 5.9.6] Federally Enforceable Through Title V Permit
47. If a leaking component is an essential component or a critical component which cannot be shut down immediately for repairs, and after being minimized still exceeds the applicable leak standard, the operator shall repair or replace the component to eliminate the leak during the next process unit turnaround or no later than one year from the date of original leak detection, which ever is earlier. [District Rule 4401, 5.9.7] Federally Enforceable Through Title V Permit
48. The operator of any steam-enhanced crude oil production well shall maintain records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401, 6.1.1] Federally Enforceable Through Title V Permit
49. An operator of any steam-enhanced crude oil production well shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system. [District Rule 4401, 6.1.3] Federally Enforceable Through Title V Permit
50. The operator shall maintain copies of training records and of the latest APCO-approved Operator Management Plan (OMP) at the facility and make such available to the APCO, ARB, and US EPA upon request. [District Rule 4401, 6.1.7, 6.1.8] Federally Enforceable Through Title V Permit
51. The results of periodic gauge tank TVP testing conducted shall be submitted to the APCO within 60 days after the completion of the testing. [District Rule 4401, 6.1.10] Federally Enforceable Through Title V Permit
52. An operator that discovers that a PRD has released shall record the date that the release was discovered, and the identity and location of the PRD that released. The operator shall submit such information recorded during the calendar year to the APCO no later than 60 days after the end of the calendar year. [District Rule 4401, 6.1.11] Federally Enforceable Through Title V Permit
53. Except as elsewhere in this permit, the operator shall source test annually all vapor collection and control systems used to control emissions from steam-enhanced crude oil production well vents to determine the control efficiency of the device(s) used for destruction or removal of VOC. Compliance testing shall be performed annually by source testers certified by ARB. Testing shall be performed during June, July, August, or September of each year if the system's control efficiency is dependent upon ambient air temperature. [District Rule 4401, 6.2.1] Federally Enforceable Through Title V Permit
54. If approved by EPA, ARB, and the APCO, an operator need not comply with the annual control efficiency testing requirement if all uncondensed VOC emissions collected by the vapor collection and control system are incinerated in fuel burning equipment, an internal combustion engine or in a smokeless flare, or if the vapor collection and control does not have a VOC destruction device. [District Rule 4401, 6.2.2, 6.2.3] 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.

55. An operator seeking approval a waiver of the annual control efficiency testing requirement shall submit a written request and supporting information to the APCO. The District shall evaluate the request and if approved by the APCO, the District shall provide EPA and ARB with a copy of the evaluation and shall request EPA and ARB approval. The District evaluation and the APCO request shall be deemed approved unless EPA or ARB objects to such approval in writing within 45 days of the receipt of the APCO request. [District Rule 4401, 6.2.4] Federally Enforceable Through Title V Permit
56. The operator shall conduct TVP testing of each gauge tank, as defined by Section 3.17 of Rule 4401, at least once every 24 months during summer (July - September), and whenever there is a change in the source or type of produced fluid in the gauge tank. The TVP testing shall be conducted at the actual storage temperature of the produced fluid in the gauge tank using the applicable TVP test method specified in Rule 4623 (Storage of Organic Liquids). [District Rule 4401, 6.2.5] Federally Enforceable Through Title V Permit
57. 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 Rule 4401, 6.3.1] Federally Enforceable Through Title V Permit
58. VOC content shall be analyzed by using the latest revision of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be performed by using ARB Method 432. [District Rule 4401, 6.3.2] Federally Enforceable Through Title V Permit
59. Leak inspection, other than audio-visual, and measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. Where safety is a concern, such as measuring leaks from compressor seals or pump seals when the shaft is rotating, a person shall measure leaks by placing the instrument probe inlet at a distance of one (1) centimeter or less from the surface of the component interface. [District Rule 4401, 6.3.3] Federally Enforceable Through Title V Permit
60. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401, 6.3.5] Federally Enforceable Through Title V Permit
61. The operator shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures, as necessary. [District Rule 4401, 6.5] 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.

62. The operator shall maintain an APCO approved Operator Management Plan (OMP). The OMP shall include, at a minimum, a description of all wells and all associated VOC collection and control systems subject to this rule, and all wells and all associated VOC collection and control systems that are exempt; an identification and description of any known hazard that might affect the safety of an inspector; except for pipes, the number of components that are subject to this rule by component type; except for pipes, the number and types of major components, inaccessible components, unsafe-to-monitor components, critical components, and essential components that are subject to this rule and the reason(s) for such designation; except for pipes, the location of components subject to the rule (components may be grouped together functionally by process unit or facility description); except for pipes, components exempt pursuant to Section 4.8 (except for components buried below ground) may be described in the OMP by grouping them functionally by process unit or facility description (the results of any laboratory testing or other pertinent information to demonstrate compliance with the applicable exemption criteria for components for which an exemption is being claimed pursuant to Sections 4.8 shall be submitted with the OMP); a detailed schedule of an operator's inspections of components to be conducted as required by this rule and whether the operator inspections of components required by this rule will be performed by a qualified contractor or by an in-house team; a description of the training standards for personnel that inspect and repair components; and a description of the leak detection training for conducting the test method specified in Section 6.3.3 for new operators, and for experienced operators, as necessary. [District Rule 4401, 6.6] Federally Enforceable Through Title V Permit
63. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements of SJVUAPCD Rules 4201 and 4801; Kern County Rule 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
64. Compliance with permit conditions in the Title V permit shall be deemed compliance with subsumed Kern County Rule 404. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
65. Permittee shall maintain records of number and type of fugitive emissions components and calculated fugitive emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
66. Permittee shall keep accurate records of daily heat input to the flare in MMBtu/day. [District Rule 2201] Federally Enforceable Through Title V Permit
67. Permittee shall maintain with this permit a current listing of all steam enhanced wells connected to the casing collection system and shall make such listing readily available for District inspection upon request. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
68. Daily records of TEOR gas and makeup gas consumed by flare shall be retained on site and shall be made readily available for District inspection upon request. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
69. Records of leaks detected during annual operator inspections, and each subsequent repair and re-inspection, shall be submitted to the District, ARB, and EPA upon request. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit
70. Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components. The records shall include a copy of the current calibration gas certification from the vendor of the calibration gas cylinder, the date of calibration, the concentration of calibration gas, the instrument reading of calibration gas before adjustment, the instrument reading of calibration gas after adjustment, the calibration gas expiration date, and the calibration gas cylinder pressure at the time of calibration. [District Rule 4401, 6.1.6] Federally Enforceable Through Title V Permit
71. All records required by this permit shall be maintained and retained for a minimum of five (5) years and made available for District, ARB, and EPA inspection upon request. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit

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

# ATTACHMENT C

Facility Comments and District Response

## Facility Comments and District Response

The District received comments on June 26, 2012 from Chevron USA on their renewed Title V permit. Since the issuance of the renewed Title V permit on January 30, 2012, the implementation of Authorities to Construct and deleting of equipment removed from service continued. As discussed below some of the comments are no longer applicable.

The District received comments for units S-1129-47-12, -48-12, and -49-12. Since the issuance of these renewed permits, these permits have been cancelled. Therefore, the comments on these units will not be discussed.

The District received comments for units S-1129-24, -53, -54, -55, -113, and -114. These units are non-compliant dormant emissions units. The District does not make modifications to non-compliant units unless the modification is a condition for dormancy. Since the comments received refer to conditions of operating control equipment and testing methods, they will not be addressed at this time. However, if the comments are still valid at the time of submitting an ATC to bringing these units into compliance, the comments can be incorporated onto the permit at that time. Therefore, the comments for these units will not be discussed.

The remaining comments are as follows.

### **S-1129-0-2: FACILITY WIDE REQUIREMENTS**

#### Facility Comments:

Condition 24: Add language to this condition to explicitly define "use"

Condition Text: All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Y

Proposed Text: All VOC-containing materials shall be stored in closed containers when not in use. In use includes, but is not limited to: being accessed, filled, emptied, maintained or repaired.

#### District Response:

Current District Rule 4601 (12/17/09), Architectural Coatings does not define "in use". However, the District concurs that the listed activities are considered "in use". Therefore, condition 24 will be modified as follows.

*All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. In use includes, but is not limited to: being accessed, filled, emptied, maintained or repaired. [District Rule 4601, 5.4]*

Facility Comments:

Condition 46: Chevron requests condition be revised to allow report submittals within 45 days of the end of the reporting period.

Condition Text: On June 30, 2002, the initial Title V permit was issued, the reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin July 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days of the end of reporting period. [District Rule 2520, 9.4.2] Y

Proposed Text: On June 30, 2002, the initial Title V permit was issued, the reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin July 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 45 days of the end of reporting period.

District Response:

The District agrees to allow this facility 45 days from the end of the reporting period to submit Report of Required Monitoring and the Compliance Certification Report. Condition 46 has been modified as proposed.

**S-1129-112-6: 5.4 MMBTU/HR GAS-FIRED HEATER TREATER WITH THREE BURNERS EACH RATED AT 1.8 MMBTU/HR - NORTH MIDWAY**

Facility Comment:

Condition 13: Revise to add EPA Method 11 or 15, ASTM D 6288, Double GC.

Condition Text: If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Y

District Response:

Condition 13 has been revised as follows:

If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using *EPA Method 11 or 15*, ASTM D 1072, D 3031, D 4084, D 3246, *D 6288, Double GC*, or grab sample analysis by GC-FPD/TCD performed in the laboratory.

**S-1129-115-6: 7.4 MMBTU/HR GAS-FIRED HEATER TREATER WITH THREE BURNERS EACH RATED AT 1.8 MMBTU/HR AND ONE BURNER RATED AT 2.0 MMBTU/HR - NORTH MIDWAY**

Facility Comment:

Condition 13: Revise to add EPA Method 11 or 15, ASTM D 6288, Double GC.

Condition Text: If the unit is fired on noncertified gaseous fuel and compliance with SO<sub>x</sub> emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Y

District Response:

Condition 13 has been revised as follows,

If the unit is fired on noncertified gaseous fuel and compliance with SO<sub>x</sub> emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using *EPA Method 11 or 15*, ASTM D 1072, D 3031, D 4084, D 3246, *D 6288, Double GC*, or grab sample analysis by GC-FPD/TCD performed in the laboratory.

**S-1129-385-12: THERMALLY ENHANCED OIL RECOVERY OPERATION WITH WELL VENT VAPOR COLLECTION PIPING NETWORK AND FLARE SERVING 40 OIL PRODUCTION WELLS (MCKITTRICK OILFIELD)**

Facility Comment:

Condition 12: Revise to add EPA Method 11 or 15, ASTM D 6288, Double GC.

Condition Text: If the flare is fired on noncertified gaseous fuel (including TEOR gas) and compliance with SO<sub>x</sub> emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2]

District Response:

Condition 12 has been revised as follows,

If the flare is fired on noncertified gaseous fuel (including TEOR gas) and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using EPA *Method 11 or 15*, ASTM D 1072, D 3031, D 4084, D 3246, *D6288*, *Double GC*, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2]