



MAR 02 2016

Mr. Kenneth Bork
Freeport-McMoRan Oil and Gas
1200 Discovery Drive Suite 500
Bakersfield, CA 93309

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)
District Facility # S1372
Project # S1160245**

Dear Mr. Bork:

Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. You requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. Freeport-McMoRan Oil and Gas has proposed to increasing the total number of steam-enhanced oil recovery wells to 165 wells on permit S1372-312-15 and 285 wells on permit S-1372-316-18.

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

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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Mr. Bork
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Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Arnaud Marjollet', is written over the printed name.

Arnaud Marjollet
Director of Permit Services

Enclosures

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

San Joaquin Valley Air Pollution Control District
Authority to Construct Application Review
Increase the Number of Steam Enhanced Wells

Facility Name: Freeport-McMoRan Oil and Gas
Mailing Address: 1200 Discovery Drive Suite 500
Bakersfield, CA 93309

Date: February 22, 2016
Engineer: Steve Davidson
Lead Engineer: Dan Klevann
Date: DK 2-24-16

Contact Person: Kenneth R. Bork
Telephone: (661) 395-5458
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Application #(s): S-1372-312-14 & ' -316-18

Project #: S-1160245

Deemed Complete: February 16, 2015

I. Proposal

Freeport-McMoRan Oil and Gas (FMOG) has requested two Authorities to Construct (ATC) permits for increasing the total allowable steam-enhanced oil recovery wells to 165 wells on permit S1372-312-15 and 285 wells on permit S-1372-316-18.

FMOG has a Title V Permit. This modification can be classified as a Title V minor modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). FMOG has requested that this project be processed in that manner; therefore, FMOG will be required to submit an Administrative Amendment application prior to operating under the revised provisions of the ATC issued with this project.

II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (4/21/11)
Rule 2410	Prevention of Significant Deterioration (6/16/11)
Rule 2520	Federally Mandated Operating Permits (6/21/01)
Rule 4001	New Source Performance Standards (4/14/99)
Rule 4002	National Emissions Standards for Hazardous Air Pollutants (5/20/04)
Rule 4101	Visible Emissions (2/17/05)
Rule 4102	Nuisance (12/17/92)
Rule 4311	Flares (06/18/09)
Rule 4401	Steam-Enhanced Crude Oil Production Wells (6/16/11)
Rule 4801	Sulfur Compounds (12/17/92)
CH&SC 41700	Health Risk Assessment
CH&SC 42301.6	School Notice
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)	

California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. Project Location

The new wells will be located at the South Midway Sunset and the South Belridge oilfields, (SW ¼, Sec: 22, T32S, R23E and NW/4 Sec: 29S, Range 21E). The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

Steam generators are used to provide high quality steam for injection into heavy crude oil production zones. The heat added by the steam reduces the viscosity of the crude oil making it easier to produce.

A well head casing vapor collection system collects vapors from the well head, condenses out the entrained liquids and routes the non-condensable vapors to the sulfur removal system and then to steam generators or a flare for incineration. Non-condensable vapors from tank vapor control systems are also routed to the steam generators for incineration.

V. Equipment Listing

Pre-Project Equipment Description:

S-1372-312-12: TEOR OPERATION INCLUDING 120 STEAM ENHANCED WELLS, WELL VENT VAPOR CONTROL SYSTEM, WELL COLLECTION PIPING, STANDBY FLARE, VAPOR PIPING TO S-1372-17 AND STANDBY FLARE, THREE-PHASE SEPARATORS, HEAT EXCHANGERS, GAS/LIQUID SEPARATORS, STORAGE VESSELS, COMPRESSORS, LUBE OIL TANKS, AND PUMPS (KEENE-KELLY-SOUTH CERRITOS-WILLIAMS LEASES)

S-1372-316-16: TEOR OPERATION SERVING 236 STEAM ENHANCED WELLS, WELL COLLECTION PIPING, FLARE, WELL VENT VAPOR CONTROL SYSTEM VAPOR PIPING TO FLARE, HEAT EXCHANGERS, GAS/LIQUID SEPARATORS, SCRUBBER, COMPRESSORS, LUBE OIL TANK AND SULFA TREAT SYSTEM (HOPKINS LEASE)

Proposed Modification:

Increase the number of TEOR wells on each permit.

S-1372-312-14: MODIFICATION OF TEOR OPERATION INCLUDING 120 STEAM ENHANCED WELLS, WELL VENT VAPOR CONTROL SYSTEM, WELL COLLECTION PIPING, STANDBY FLARE, VAPOR PIPING TO S-1372-17 AND STANDBY FLARE, THREE-PHASE SEPARATORS, HEAT EXCHANGERS, GAS/LIQUID SEPARATORS, STORAGE VESSELS, COMPRESSORS, LUBE OIL TANKS,

AND PUMPS (KEENE-KELLY-SOUTH CERRITOS-WILLIAMS LEASES):
INCREASE WELL COUNT TO 165

S-1372-316-18: MODIFICATION OF TEOR OPERATION SERVING 236 STEAM ENHANCED WELLS, WELL COLLECTION PIPING, FLARE, WELL VENT VAPOR CONTROL SYSTEM VAPOR PIPING TO FLARE, HEAT EXCHANGERS, GAS/LIQUID SEPARATORS, SCRUBBER, COMPRESSORS, LUBE OIL TANK AND SULFA TREAT SYSTEM (HOPKINS LEASE): INCREASE WELL COUNT TO 285

Post Project Equipment Description:

S-1372-312-14: TEOR OPERATION INCLUDING 165 STEAM ENHANCED WELLS, WELL VENT VAPOR CONTROL SYSTEM, WELL COLLECTION PIPING, STANDBY FLARE, VAPOR PIPING TO S-1372-17 AND STANDBY FLARE, THREE-PHASE SEPARATORS, HEAT EXCHANGERS, GAS/LIQUID SEPARATORS, STORAGE VESSELS, COMPRESSORS, LUBE OIL TANKS, AND PUMPS (KEENE-KELLY-SOUTH CERRITOS-WILLIAMS LEASES)

S-1372-316-18: TEOR OPERATION SERVING 285 STEAM ENHANCED WELLS, WELL COLLECTION PIPING, FLARE, WELL VENT VAPOR CONTROL SYSTEM VAPOR PIPING TO FLARE, HEAT EXCHANGERS, GAS/LIQUID SEPARATORS, SCRUBBER, COMPRESSORS, LUBE OIL TANK AND SULFA TREAT SYSTEM (HOPKINS LEASE)

VI. Emission Control Technology Evaluation

Volatile organic compounds (VOCs) are the only criteria pollutants emitted from the well casing collection and control systems. VOC emissions from the well casing collection systems and the associated vapor control systems are controlled with $\geq 99\%$ efficiency in accordance with Rule 4401. The vapor collection system includes the well casing gas piping network, compressors, pumps, liquid/gas separators and heat exchangers. Vapor control consists of either injection of VOCs back into the ground through DOGGR-approved wells or incineration in an approved flare or steam generators; therefore, fugitive VOC emissions are controlled pursuant to the requirements of Rule 4401.

VII. General Calculations

A. Assumptions

- Facility operates 8760 hours per year.
- The subject equipment has the potential to emit only VOC.
- VOC content of the casing gas for all existing and proposed wells is less than 10% VOC by weight .
- There is no change in the flare emissions associated with the flares listed on the permits.
- There is no change to the emissions associated with the flares listed on the permits; therefore, the flare emissions will be taken from projects S-1053127 and S-1060373.

B. Emission Factors

Per District Policy SSP-2015, no emissions are assessed to piping and components handling fluid streams with a VOC content of 10% or less by weight (i.e. VOCs as a percentage of the entire gas stream). Therefore, there are no emissions expected and no emission factors are required. Permit conditions requiring periodic monitoring and record keeping verifying that the VOC content is 10% or less by weight will be required.

C. Calculations

1. Pre-Project Potential to Emit (PE1)

The VOC content of VOC content of the casing gas for all existing and proposed wells is less than 10% VOC by weight. Therefore, PE1 = 0.0 lbs per day for the wells listed on the permits.

There is no change in the flare emissions listed on permit S-1372-312; therefore, the emissions are taken from project S-1053127 and are listed below:

Standby Flare S-1372-312		
Pollutant	lb/day	lb/year
NOx	34.3	12,520
SOx	411.4	150,161
PM ₁₀	13.1	4782
CO	186.5	68,072
VOC	31.8	11,607

There is no change in the flare emissions listed on permit S-1372-316; therefore, the emissions are taken from project S-1060373 and are listed below:

Standby Flare S-1372-312-316		
Pollutant	lb/day	lb/year
NOx	32.6	4468
SOx	516.1	70,628
PM ₁₀	3.8	526
CO	177.6	24,309
VOC	30.2	4139

2. Post Project Potential to Emit (PE2)

The VOC content of VOC content of the casing gas for all existing and proposed wells is less than 10% VOC by weight. Therefore, PE2 = 0.0 lbs per day for the wells listed on the permits.

There is no change in the flare emissions listed on permit S-1372-312 or S-1372-316; therefore, for the flares: PE2 = PE1.

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

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

The SSPE1 is taken from project S1143358 and is listed below:

SSPE1 (lb/year)				
NO_x	SO_x	PM₁₀	CO	VOC
431,241	2,549,708	375,276	2,795,594	429,394

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

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

SSPE1 (lb/year)				
NO_x	SO_x	PM₁₀	CO	VOC
431,241	2,549,708	375,276	2,795,594	429,394

5. Major Source Determination

Rule 2201 Major Source Determination:

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

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

This source is an existing Major Source for all criteria pollutants and will remain a Major Source for all criteria pollutants. No change in other pollutants are proposed or expected as a result of this project.

Rule 2410 Major Source Determination:

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(iii). Therefore the PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

PSD Major Source Determination (tons/year)						
	NO2	VOC	SO2	CO	PM	PM10
Estimated Facility PE before Project Increase	--	--	--	1397	--	--
PSD Major Source Thresholds	250	250	250	250	250	250
PSD Major Source ? (Y/N)	Y	Y	Y	Y	Y	Y

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

6. Baseline Emissions (BE)

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

Pursuant to District Rule 2201, BE = PE1 for:

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

otherwise,

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

a. BE VOC

Clean Emissions Unit, Located at a Major Source

Pursuant to Rule 2201, a Clean Emissions Unit is defined as an emissions unit that is “equipped with an emissions control technology with a minimum control efficiency of at least 95% or is equipped with emission control technology that meets the requirements for achieved-in-practice BACT as accepted by the APCO during the five years immediately prior to the submission of the complete application.

This wells are equipped with an vapor control system and inspection and maintenance program with noncondensables incinerated at steam generator, incinerator, or equal, which meets the requirements for achieved-in-practice BACT. Therefore, BE=PE1.

7. SB 288 Major Modification

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

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

Therefore this project is not an SB 288 Major Modification.

8. Federal Major Modification

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

Since this source is not included in the 28 specific source categories specified in 40 CFR 51.165, the increases in fugitive emissions are not included in the Federal Major Modification determination. Therefore this is not a new Federal Major Modification and no further discussion is required..

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

Rule 2410 applies to any pollutant regulated under the Clean Air Act, except those for which the District has been classified nonattainment. The pollutants which must be addressed in the PSD applicability determination for sources located in the SJV and which are emitted in this project are: (See 52.21 (b) (23) definition of significant)

- NO₂ (as a primary pollutant)
- SO₂ (as a primary pollutant)
- CO
- PM
- PM₁₀

I. Project Location Relative to Class 1 Area

As demonstrated in the "PSD Major Source Determination" Section above, the facility was determined to be a existing PSD Major Source. Because the project is not located within 10 km (6.2 miles) of a Class 1 area – modeling of the emission increase is not required to determine if the project is subject to the requirements of Rule 2410.

II. Project Emission Increase – Significance Determination

a. Evaluation of Calculated Post-project Potential to Emit for New or Modified Emissions Units vs PSD Significant Emission Increase Thresholds

As a screening tool, the post-project potential to emit from all new and modified units is compared to the PSD significant emission increase thresholds, and if the total potentials to emit from all new and modified units are below the applicable thresholds, no further PSD analysis is needed.

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

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

10. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. Detailed QNEC calculations are included in Appendix C.

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

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

- a. Any new emissions unit with a potential to emit exceeding two pounds per day,
- b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
- c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or

- d. Any new or modified emissions unit, in a stationary source project, which results in an SB 288 Major Modification or a Federal Major Modification, as defined by the rule.

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

a. New emissions units – PE > 2 lb/day

As discussed in Section I above, there are no new emissions units associated with this project. Therefore BACT for new units with PE > 2 lb/day purposes is not triggered.

b. Relocation of emissions units – PE > 2 lb/day

As discussed in Section I above, there are no emissions units being relocated from one stationary source to another; therefore BACT is not triggered.

c. Modification of emissions units – AIPE > 2 lb/day

$$\text{AIPE} = \text{PE2} - \text{HAPE}$$

Where,

AIPE = Adjusted Increase in Permitted Emissions, (lb/day)

PE2 = Post-Project Potential to Emit, (lb/day)

HAPE = Historically Adjusted Potential to Emit, (lb/day)

$$\text{HAPE} = \text{PE1} \times (\text{EF2}/\text{EF1})$$

Where,

PE1 = The emissions unit's PE prior to modification or relocation, (lb/day)

EF2 = The emissions unit's permitted emission factor for the pollutant after modification or relocation. If EF2 is greater than EF1 then EF2/EF1 shall be set to 1

EF1 = The emissions unit's permitted emission factor for the pollutant before the modification or relocation

$$\text{AIPE} = \text{PE2} - (\text{PE1} * (\text{EF2} / \text{EF1}))$$

S-1372-312-14:

TEOR Wells:

$$\begin{aligned} \text{AIPE} &= 0 - (0 * (1)) \\ &= 0 - 0 * 1 \\ &= 0.0 \text{ lb/day} \end{aligned}$$

S-1372-316-18:
TEOR Wells:

$$\begin{aligned} \text{AIPE} &= 0 - (0 * (1)) \\ &= 0 - 0 * 1 \\ &= 0.0 \text{ lb/day} \end{aligned}$$

As demonstrated above, the AIPE is not greater than 2.0 lb/day for VOC emissions. Therefore, BACT is not triggered.

d. SB 288/Federal Major Modification

As discussed in Sections VII.C.7 and VII.C.8 above, this project does not constitute an SB 288 and/or Federal Major Modification for NO_x emissions. Therefore BACT is not triggered for any pollutant.

B. Offsets

1. Offset Applicability

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

The SSPE2 is compared to the offset thresholds in the following table.

Offset Determination (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
SSPE2	431,241	2,549,708	375,276	2,795,594	429,394
Offset Thresholds	20,000	54,750	29,200	200,000	20,000
Offsets triggered?	No ¹	No ¹	No ¹	No ¹	No

¹Only VOC emissions are associated with this project; therefore, offsets are not triggered for NO_x, SO_x, PM₁₀, and CO.

2. Quantity of Offsets Required

As seen above, the SSPE2 is greater than the offset thresholds for all criteria pollutants. However, only VOC emissions are associated with this project; therefore, offsets are only triggered for VOCs.

Offsets Required (lb/year) = (Σ[PE2 – BE] + ICCE) x DOR, for all new or modified emissions units in the project,

Where,
PE2 = Post Project Potential to Emit, (lb/year)

BE = Baseline Emissions, (lb/year)
ICCE = Increase in Cargo Carrier Emissions, (lb/year)
DOR = Distance Offset Ratio, determined pursuant to Section 4.8

The TEOR operation is a clean emissions unit, located at a Major Source; therefore, BE = PE1. Also, there is only one emissions unit associated with this project and there are no increases in cargo carrier emissions; therefore, offsets can be determined as follows:

$$\text{Offsets Required (lb/year)} = ([\text{PE2} - \text{BE}] + \text{ICCE}) \times \text{DOR}$$

PE2 (VOC) = 0 lb-VOC/year
BE (VOC) = 0 lb-VOC/year
ICCE = 0 lb/year

The amount of offsets required is zero. Therefore, offsets will not be required for this project.

C. Public Notification

1. Applicability

Public noticing is required for:

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

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

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

As demonstrated in Sections VII.C.7 and VII.C.8, this project does not constitute an SB 288 or Federal Major Modification; therefore, public noticing for SB 288 or Federal Major Modification purposes is not required.

b. PE > 100 lb/day

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

c. Offset Threshold

The SSPE1 and SSPE2 are compared to the offset thresholds in the following table.

Offset Thresholds				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO _x	431,241	431,241	20,000 lb/year	No
SO _x	2,549,708	2,549,708	54,750 lb/year	No
PM ₁₀	375,276	375,276	29,200 lb/year	No
CO	2,795,594	2,795,594	200,000 lb/year	No
VOC	429,394	429,394	20,000 lb/year	No

As detailed above, there were no thresholds surpassed with this project; therefore public noticing is not required for offset purposes.

d. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE = SSPE2 – SSPE1. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table.

SSIPE Public Notice Thresholds					
Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
NO _x	431,241	431,241	0	20,000 lb/year	No
SO _x	2,549,708	2,549,708	0	20,000 lb/year	No
PM ₁₀	375,276	375,276	0	20,000 lb/year	No
CO	2,795,594	2,795,594	0	20,000 lb/year	No
VOC	429,394	429,394	0	20,000 lb/year	No

As demonstrated above, the SSIPEs for all pollutants were less than 20,000 lb/year; therefore public noticing for SSIPE purposes is not required.

e. Title V Significant Permit Modification

As shown in the Discussion of Rule 2520 below, this project does not constitute a Title V significant modification. Therefore, public noticing for Title V significant modifications is not required for this project.

2. Public Notice Action

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

D. Daily Emission Limits (DELs)

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

Proposed Rule 2201 (DEL) Conditions:

- VOC content of well vent vapor gas shall not exceed 10% by weight. If the VOC content of the well vent vapor gas is less than 10% by weight for 8 consecutive quarterly samplings per District approved plan, sampling frequency shall only be required annually. Permittee shall conduct quarterly gas sampling immediately downstream of the initial compressor. If gas samples are 10% VOC by weight or less for 8 consecutive quarterly samplings, sampling shall only be required annually. [District Rule 2201] Y

E. Compliance Assurance

1. Source Testing

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

2. Monitoring

Monitoring requirements will be discussed under Rule 4401 compliance discussion below.

3. Recordkeeping

Recordkeeping conditions for the TEOR system are specified in Section 6.1 of Rule 4401:

- All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4401, 6.1] Y

Rule 2410 Prevention of Significant Deterioration

As shown in Section VII. C. 9. above, this project does not result in a new PSD major source or PSD major modification. No further discussion is required.

Rule 2520 Federally Mandated Operating Permits

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

In accordance with Rule 2520, these modifications:

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

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

Rule 4001 New Source Performance Standards (NSPS)

This rule incorporates NSPS from Part 60, Chapter 1, Title 40, Code of Federal Regulations (CFR); and applies to all new sources of air pollution and modifications of existing sources of air pollution listed in 40 CFR Part 60. However, no subparts of 40 CFR Part 60 apply to steam enhanced oil wells.

Rule 4002 National Emission Standards for Hazardous Air Pollutants (NESHAPs)

This rule incorporates NESHAPs from Part 61, Chapter I, Subchapter C, Title 40, CFR and the NESHAPs from Part 63, Chapter I, Subchapter C, Title 40, CFR; and applies to all sources of hazardous air pollution listed in 40 CFR Part 61 or 40 CFR Part 63. However, no subparts of 40 CFR Part 61 or 40 CFR Part 63 apply to steam enhanced oil wells.

Rule 4101 Visible Emissions

Rule 4101 states that no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity). Since leaks are limited to less than 10,000 ppm, visible emissions are not expected to exceed Ringelmann 1 or 20% opacity. Also, based on past inspections of the facility, continued compliance is expected.

Rule 4102 Nuisance

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

California Health & Safety Code 41700 (Health Risk Assessment)

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

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

The cancer risk for this project is shown below:

HRA Summary		
Unit	Cancer Risk	T-BACT Required
S-1372-312-14	0.0063 per million	No
S-1372-316-18	0.0084 per million	No

Discussion of T-BACT

BACT for toxic emission control (T-BACT) is required if the cancer risk exceeds one in one million. As demonstrated above, T-BACT is not required for this project because the HRA indicates that the risk is not above the District's thresholds for triggering T-BACT requirements; therefore, compliance with the District's Risk Management Policy is expected.

District policy APR 1905 also specifies that the increase in emissions associated with a proposed new source or modification not have acute or chronic indices, or a cancer risk greater than the District's significance levels (i.e. acute and/or chronic indices greater than 1 and a cancer risk greater than 20 in a million). As outlined by the HRA Summary in

Appendix B of this report, the emissions increases for this project was determined to be less than significant.

Rule 4311 Flares

The purpose of this Rule is to limit the emissions of volatile organic compounds (VOC), oxides of nitrogen (NO_x), and sulfur oxides (SO_x) from the operation of flares. The flares listed on the permits in the project are currently in compliance with this Rule. The proposed changes are not expected to effect the flares. Continued compliance is expected.

Rule 4401 Steam-Enhanced Crude Oil Production Well Vents

The purpose of this rule is to limit the VOC emissions from steam-enhanced crude oil production wells. This rule is applicable to all steam-enhanced crude oil production wells and any associated vapor collection and control systems. The existing vapor control system will control the proposed steam drive wells by at least 99% and the vapor control system components will continue be maintained in good repair so as not to exceed the maximum allowable fugitive emissions.

The vapor control system exclusively handling gas/vapor or liquid with a VOC content of ten percent by weight or less (≤ 10 wt.%). Therefore, per section 4.7, the requirements of Section 5.4.1 through Section 5.4.7 of this rule do not apply. The following conditions will be removed from the permit.

Section 3.0, Definitions

Section 3.20.1 defines various types of gas and liquid leaks.

The following condition will be included on the ATC to ensure compliance:

- 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]

Section 4.0, Exemptions

Section 4.1 states that any steam-enhanced crude oil production well undergoing service or repair during the time the well is not producing is exempt from the requirements of this rule as stated in the following ATC condition:

- During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the emission control requirements of District Rule 4401, 5.0 (as amended December 14, 2006). [District Rule 4401, 4.1]

Section 5.1.1 Vapor Control System Requirements

Section 5.1.1 requires that if the well vents are closed that the front line production equipment be connected to a VOC collection and control system as defined in Section 3.0. The following condition will be included in the ATC:

- An operator shall not operate a steam-enhanced crude oil production well unless the operator complies with either of the following requirements: The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401, the well vent may be 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, or the steam-enhanced crude oil production well vent is open and the well vent is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401, 5.1]

Section 5.2: Operating Requirements

- An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of 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., a component with a major liquid leak, or a component with a gas leak greater than 50,000 ppmv. [District Rule 4401 5.2] Y
- An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of any combination of components with minor liquid leaks, minor gas leaks, or a gas leaks greater than 10,000 ppmv up to 50,000 ppmv that totals more than number of leaks allowed by Table 2 of Rule 4401. [District Rule 4401 5.2.2] Y

Section 5.3: Operating Requirements

The permittee shall comply with the following operating requirements:

- An operator shall not use any component with a leak as defined in Section 3.0 of Rule 4401, or that is found to be in violation of the provisions of Section 5.2.2 of Rule 4401. However, components that were found leaking may be used provided such leaking components have been identified with a tag for repair, are repaired, or awaiting re-inspection after being repaired within the applicable time frame specified in Section 5.5 of Rule 4401. [District Rule 4401 5.3.1] Y
- 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 with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401 5.3.2] Y
- An operator shall comply with the requirements of Section 6.7 of Rule 4401 if there is any change in the description of major components or critical components. [District Rule 4401 5.3.3] Y

Section 5.4: Inspection and Re-inspection Requirements

- 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 5.4.8] Y

Section 5.5: Leak Repair Requirements

- An operator shall affix a readily visible weatherproof tag to a leaking component upon detection of the leak and shall include the following information on the tag: date and time of leak detection, date and time of leak measurement, for a gaseous leak, the leak concentration in ppmv, for a liquid leak, whether it is a major liquid leak or a minor liquid leak, whether the component is an essential component, an unsafe-to-monitor component, or a critical component. [District Rule 4401 5.5.1] Y
- An operator shall keep the tag affixed to the component until an operator has met all of the following conditions: repaired or replaced the leaking component, re-inspected the component using the test method in Section 6.3.3, and 5.5.2.3 of Rule 4401, or the component is found to be in compliance with the requirements of this rule. [District Rule 4401 5.5.2] Y
- An operator shall minimize a component leak in order to stop or reduce leakage to the atmosphere immediately to the extent possible, but not later than one (1) hour after detection of the leak. [District Rule 4401 5.5.3] Y
- Except for leaking critical components or leaking essential components subject to the requirements of Section 5.5.7 of Rule 4401, if an operator has minimized a leak but the leak still exceeds the applicable leak limits as defined in Section 3.0 of Rule 4401, an operator shall comply with at least one of the following requirements as soon as

practicable but not later than the time period specified in Table 3 of Rule 4401: Repair or replace the leaking component; or vent the leaking component to a VOC collection and control system as defined in Section 3.0 of Rule 4401, or remove the leaking component from operation. [District Rule 4401 5.5.4] Y

- The repair period in calendar days shall not exceed 14 days for minor gas leaks, 5 days for major gas leaks less than or equal to 50,000 ppmv, 2 days for gas leak greater than 50,000 ppmv, 3 days for minor liquid leaks, 2 days for major liquid leaks. [District Rule 4401 5.5.4] Y
- The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period specified in Table 3 of Rule 4401. [District Rule 4401 5.5.5] Y
- The time of the initial leak detection shall be the start of the repair period specified in Table 3 of Rule 4401. [District Rule 4401 5.5.6] Y
- If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401 5.5.7] Y

Section 6.1: Recordkeeping and Submissions

Section 6.1 requires that an operator shall maintain the records required by Sections 6.1 and 6.2 for a period of five (5) years. These records shall be made available to the APCO upon request. The following condition will be listed on the ATCs to ensure compliance:

- 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] Y
- 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 as defined in Section 3.0 of Rule 4401. [District Rule 4401 6.1.3] Y
- Operator shall keep an inspection log maintained pursuant to Section 6.4 of Rule 4401. [District Rule 4401 6.1.4] Y
- Records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, instrument reading of calibration gas before adjustment, instrument

reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration shall be maintained. [District Rule 4401 6.1.5] Y

- An operator shall maintain copies at the facility of the training records of the training program operated pursuant to Section 6.5 of Rule 4401. [District Rule 4401 6.1.6] Y
- Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401 6.1.7] Y
- Operator shall submit a list of all gauge tanks, as defined in Section 3.0. The list shall contain the size, identification number, the location of each gauge tank and specify whether the gauge tank is upstream of all front line production equipment. [District Rule 4401 6.1.8] Y
- The results of gauge tank TVP testing conducted pursuant to Section 6.2.5 shall be submitted to the APCO within 60 days after the completion of the testing. [District Rule 4401 6.1.9] Y
- 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. An 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 6.1.10] Y

Section 6.2: Compliance Source Testing

Section 6.2 requires annual compliance source testing of all VOC 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. Therefore, the following conditions will be placed on the permit:

- An 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] Y
- If approved by the APCO, an operator need not comply with the annual testing requirement of Section 6.2.1 if all uncondensed VOC emissions collected by a vapor collection and control system are incinerated in fuel burning equipment, an internal combustion engine or in a smokeless flare. [District Rule 4401 6.2.2] Y
- An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.0 of Rule 4401: an operator shall conduct periodic TVP testing

of each gauge tank 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 Section 6.4 of Rule 4623 (Storage of Organic Liquids). The operator shall submit the TVP testing results to the APCO as specified in Section 6.1.9 of Rule 4401. [District Rule 4401 6.2.3] Y

Section 6.3: Test Methods

- 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] Y
- 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] Y
- 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] Y
- 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 6.3.4] Y

Section 6.4: Inspection Log

- Operator shall maintain an inspection log in which an operator records, at a minimum, all of the following information for each inspection performed: The total number of components inspected, total number and percentage of leaking components found by component type, location, type, and name or description of each leaking component and description of any unit where the leaking component is found, date of leak detection and the method of leak detection. For gaseous leaks, the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak. the date of repair, replacement, or removal from operation of leaking components, identify 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 earlier, methods 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, the date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced, the inspector's name, business mailing address, and business telephone number, date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401 6.4] Y

Section 6.5: Employee Training Program

- 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] Y

Section 6.6: Operator Management Plan

- 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 4.6 shall be submitted with the OMP. A detailed schedule of an operator's inspections of components to be conducted 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] Y

Section 6.7: Additional Administrative Requirements

- 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] Y

Rule 4801 Sulfur Compounds

The purpose of this rule is to limit the emissions of sulfur compounds. The units in this project are currently in compliance with this Rule. The proposed changes are not expected to change compliance with this Rule. Continued compliance is expected.

California Health & Safety Code 42301.6 (School Notice)

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

California Environmental Quality Act (CEQA)

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

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that all project specific emission unit(s) do not trigger Best Available Control Technology (BACT) and do not trigger Toxic Best Available Control Technology (T-BACT) requirements.

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

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Issue ATCs S-1372-312-14 and '316-18subject to the permit conditions on the attached draft ATC in **Appendix F**.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
S-1372-312-14	3020-09-A	165 Wells	\$1615.35
S-1372-316-18	3020-09-A	285 Wells	\$2790.15

APPENDIX A
Current PTOs

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1372-312-12

EXPIRATION DATE: 05/31/2016

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

TEOR OPERATION INCLUDING 120 STEAM ENHANCED WELLS, WELL VENT VAPOR CONTROL SYSTEM, WELL COLLECTION PIPING, STANDBY FLARE, VAPOR PIPING TO S-1372-17 AND STANDBY FLARE, THREE-PHASE SEPARATORS, HEAT EXCHANGERS, GAS/LIQUID SEPARATORS, STORAGE VESSELS, COMPRESSORS, LUBE OIL TANKS, AND PUMPS (KEENE-KELLY-SOUTH CERRITOS-WILLIAMS LEASES)

PERMIT UNIT REQUIREMENTS

1. All equipment shall be constructed, maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Permittee shall maintain with the permit a current listing of all steam enhanced wells connected to the casing vent control system and shall make such listing readily available for District inspection upon request. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
3. VOC content of the collected TEOR vapors shall not exceed 10% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC content of TEOR gas shall be tested not less than quarterly thereafter. If compliance with the 10% VOC content limit has been demonstrated for 8 consecutive quarters, then the testing frequency shall be annually. If an annual source test fails to show compliance, quarterly testing shall resume. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
5. Total uncontrolled VOC emissions from all well vents shall be reduced by at least 99%. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Permittee shall maintain a written record of VOC content of the TEOR gas. [District NSR Rule and District Rule 9.3.2] Federally Enforceable Through Title V Permit
7. Operation shall include sulfa check system, to be used when necessary to meet sulfur compounds limits of standby flare and steam generators S-1372-17. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The compressed gas knockout scrubber shall precede the steam generator S-1372-17 and standby flare. [District Rule NSR] Federally Enforceable Through Title V Permit
9. Standby flare shall only be used to incinerate TEOR vapors when steam generator permit S-1372-17 is inoperative. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Oxides of sulfur emissions shall not exceed 1578.1 b/day as SO₂ from the following steam generators: S-1372-8, '17, '18, '19, '20 and standby flare S-1372-312. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Permittee shall maintain accurate records of well casing vapor H₂S concentration (periodic sampling of no less than once per quarter) and daily volume of casing vapor incinerated. [District Rule 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. The following test method shall be used for fuel gas sulfur content - ASTM D3246 or double GC for H₂S and mercaptans. [District Rule 2520, 9.3.2] 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.

13. The flare in this permit shall be inspected every two weeks while in operation for visible emissions. If visible emissions are observed, corrective action shall be taken. If visible emissions continue, an EPA method 9 test shall be conducted within 72 hours. [District Rule 2520, 9.3.2] 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. Flare shall comply with all of the applicable requirements of Rule 4311. [District Rule 4311] Federally Enforceable Through Title V Permit
16. The 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. The flare outlet shall be equipped with an automatic ignition system, or, shall operate with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rule 4311, 5.3] Federally Enforceable Through Title V Permit
18. Except for flares equipped with a flow-sensing ignition system, a 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 installed and operated. [District Rule 4311, 5.4] Federally Enforceable Through Title V Permit
19. Flares using flow-sensing automatic ignition systems and not using a continuous flame pilot shall use purge gas for purging. [District Rule 4311, 5.5] Federally Enforceable Through Title V Permit
20. Open flares (air-assisted, steam-assisted, or non-assisted) in which the flare gas pressure is less than 5 psig shall be operated in such a manner that meets the provisions of 40 CFR 60.18. [District Rule 4311, 5.6] Federally Enforceable Through Title V Permit
21. Flaring is prohibited unless it is consistent with an approved flare minimization plan (FMP), pursuant to Rule 4311, Section 6.5, and all commitments listed in that plan have been met. This standard shall not apply if the APCO determines that the flaring is caused by an emergency as defined by Section 3.7 and is necessary to prevent an accident, hazard or release of vent gas directly to the atmosphere [District Rule 4311, 5.8] Federally Enforceable Through Title V Permit
22. The operator of a flare subject to flare minimization requirements pursuant to Section 5.8 shall monitor the vent gas flow to the flare with a flow measuring device or other parameters as specified in the Permit to Operate. The operator shall maintain records pursuant to Section 6.1.7. Flares that the operator can verify, based on permit conditions, are not capable of producing reportable flare events pursuant to Section 6.2.2 shall not be required to monitor vent gas flow to the flare. [District Rule 4311, 5.10] Federally Enforceable Through Title V Permit
23. The following records shall be maintained, retained on-site for a minimum of five years, and made available to the APCO, ARB, and EPA upon request: 1) A copy of the compliance determination conducted pursuant to Section 6.4.1, 2) For flares used during an emergency, record of the duration of flare operation, amount of gas burned, and the nature of the emergency situation, 3) A copy of the approved flare minimization plan pursuant to Section 6.5, 4) On and after July 1, 2012, where applicable, a copy of annual reports submitted to the APCO pursuant to Section 6.2, and 5) Where applicable, monitoring data collected pursuant to Sections 5.10. [District Rule 4311, 6.1] Federally Enforceable Through Title V Permit
24. The operator of a flare subject to flare minimization plans pursuant to Section 5.8 of Rule 4311 shall notify the APCO of an unplanned flaring event within 24 hours after the start of the next business day or within 24 hours of their discovery, whichever ever occurs first. The notification shall include the flare source identification, the start date and time, and the end date and time. [District Rule 4311, 6.2.1] 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.

25. Effective on and after July 1, 2012, and annually thereafter, the operator of a flare subject to flare minimization plans pursuant to Section 5.8 shall submit an annual report to the APCO that summarizes all Reportable Flaring Events as defined in Section 3.0 that occurred during the previous 12 month period. The report shall be submitted within 30 days following the end of the twelve month period of the previous year. The report shall include, but is not limited to all of the following: 1) The results of an investigation to determine the primary cause and contributing factors of the flaring event; 2) Any prevention measures considered or implemented to prevent recurrence together with a justification for rejecting any measures that were considered but not implemented; 3) If appropriate, an explanation of why the flaring was an emergency and necessary to prevent accident, hazard or release of vent gas to the atmosphere, or where, due to a regulatory mandate to vent a flare, it cannot be recovered, treated and used as a fuel gas at the facility; and 4) The date, time, and duration of the flaring event. [District Rule 4311, 6.2.2] Federally Enforceable Through Title V Permit
26. Effective on and after July 1, 2012, and annually thereafter, the operator of a flare subject to flare monitoring requirements pursuant to Rule 4311, Sections 5.10, 6.6, 6.7, 6.8, 6.9, and 6.10, as appropriate, shall submit an annual report to the APCO within 30 days following the end of each 12 month period. The report shall include the following: 1) The total volumetric flow of vent gas in standard cubic feet for each day, 2) Hydrogen sulfide content, methane content, and hydrocarbon content of vent gas composition pursuant to Section 6.6, 3) If vent gas composition is monitored by a continuous analyzer or analyzers pursuant to Section 5.11, average total hydrocarbon content by volume, average methane content by volume, and depending upon the analytical method used pursuant to Section 6.3.4, total reduced sulfur content by volume or hydrogen sulfide content by volume of vent gas flared for each hour of the month, 4) If the flow monitor used pursuant to Section 5.10 measures molecular weight, the average molecular weight for each hour of each month, 5) For any pilot and purge gas used, the type of gas used, the volumetric flow for each day and for each month, and the means used to determine flow, 6) Flare monitoring system downtime periods, including dates and times, 7) For each day and for each month provide calculated sulfur dioxide emissions, and 8) A flow verification report for each flare subject to this rule. The flow verification report shall include flow verification testing pursuant to Section 6.3.5. [District Rule 4311, 6.2.3] Federally Enforceable Through Title V Permit
27. Total hydrocarbon content and methane content of vent gas shall be determined using ASTM Method D 1945-96, ASTM Method UOP 539-97, EPA Method 18, or EPA Method 25A or 25B. Hydrogen sulfide content of vent gas shall be determined using ASTM Method D 1945-96, ASTM Method UOP 539-97, ASTM Method D 4084-94, or ASTM Method D 4810-88. [District Rule 4311, 6.3.4] Federally Enforceable Through Title V Permit
28. Upon request, the operator of flares that are subject to Section 5.6 shall make available to the APCO the compliance determination records that demonstrate compliance with the provisions of 40 CFR 60.18, (c)(3) through (c)(5). [District Rule 4311, 6.4.1] Federally Enforceable Through Title V Permit
29. Casing vapor collection system shall be equipped with vapor flowrate indicator/recorder downstream of condensible recovery system measuring total flowrate. [District NSR Rule and 1070] Federally Enforceable Through Title V Permit
30. Collected condensate shall be discharged into production pipeline. [District NSR Rule] Federally Enforceable Through Title V Permit
31. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the emission control requirements of District Rule 4401. [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
32. The inspection requirements of Section 5.4.1 through Section 5.4.7 of Rule 4401 shall not apply to components exclusively handling gas/vapor or liquid with a VOC content of ten percent by weight (10%) or less, as determined by the test methods in Section 6.3.4 of Rule 4401. [District Rule 4401, 4.7] Federally Enforceable Through Title V Permit
33. Gas and liquid leaks are as defined in Section 3.20 of Rule 4401. [District Rule 4401, 3.20] 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.

34. An operator shall not operate a steam-enhanced crude oil production well unless the operator complies with either of the following requirements: The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401, the well vent may be 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, or the steam-enhanced crude oil production well vent is open and the well vent is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401, 5.1.1 and 5.1.2] Federally Enforceable Through Title V Permit
35. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of 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 as defined by Section 5.2.2.1 of Rule 4401 requiring process fluid flow through the open-ended lines, a component with a major liquid leak, or a component with a gas leak greater than 50,000 ppmv. [District Rule 4401, 5.2.2] Federally Enforceable Through Title V Permit
36. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of any combination of components with minor liquid leaks, minor gas leaks, or a gas leaks greater than 10,000 ppmv up to 50,000 ppmv that totals more than number of leaks allowed by Table 2 of Rule 4401. [District Rule 4401, 5.2.2] Federally Enforceable Through Title V Permit
37. An operator shall not use any component with a leak as defined in Section 3.0 of Rule 4401, or that is found to be in violation of the provisions of Section 5.2.2 of Rule 4401. However, components that were found leaking may be used provided such leaking components have been identified with a tag for repair, are repaired, or awaiting re-inspection after being repaired within the applicable time frame specified in Section 5.5 of Rule 4401. [District Rule 4401, 5.3.1] Federally Enforceable Through Title V Permit
38. 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 with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401, 5.3.2] Federally Enforceable Through Title V Permit
39. An operator shall comply with the requirements of Section 6.7 of Rule 4401 if there is any change in the description of major components or critical components. [District Rule 4401, 5.3.3] Federally Enforceable Through Title V Permit
40. Except for pipes and unsafe-to-monitor components, an operator shall inspect all other components pursuant to the requirements of Section 6.3.3 of Rule 4401 at least once every year. [District Rule 4401, 5.4.1] Federally Enforceable Through Title V Permit
41. An operator shall visually inspect all pipes 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 the time frame specified in Table 3 of Rule 4401. [District Rule 4401, 5.4.2] Federally Enforceable Through Title V Permit
42. In addition to the inspections required by Section 5.4.1 of Rule 4401, an operator shall inspect for leaks all accessible operating pumps, compressors, and PRDs in service as follows: An 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. 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 the time frame specified in Table 3 of Rule 4401. [District Rule 4401, 5.4.3] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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43. In addition to the inspections required by Sections 5.4.1, 5.4.2 and 5.4.3 of Rule 4401, operator shall perform the following: 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, re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection, inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. Except for PRDs subject to the requirements of Section 5.4.4.1 of Rule 4401, an operator shall inspect a component that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. [District Rule 4401, 5.4.4] Federally Enforceable Through Title V Permit
44. An operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401, 5.4.7] Federally Enforceable Through Title V Permit
45. 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, 5.4.8] Federally Enforceable Through Title V Permit
46. An operator shall affix a readily visible weatherproof tag to a leaking component upon detection of the leak and shall include the following information on the tag: date and time of leak detection, date and time of leak measurement, for a gaseous leak, the leak concentration in ppmv, for a liquid leak, whether it is a major liquid leak or a minor liquid leak, whether the component is an essential component, an unsafe-to monitor component, or a critical component. [District Rule 4401, 5.5.1] Federally Enforceable Through Title V Permit
47. An operator shall keep the tag affixed to the component until an operator has met all of the following conditions: repaired or replaced the leaking component, re-inspected the component using the test method in Section 6.3.3, and the component is found to be in compliance with the requirements of this rule. [District Rule 4401 5.5.2] Federally Enforceable Through Title V Permit
48. An operator shall minimize a component leak in order to stop or reduce leakage to the atmosphere immediately to the extent possible, but not later than one (1) hour after detection of the leak. [District Rule 4401, 5.5.3] Federally Enforceable Through Title V Permit
49. Except for leaking critical components or leaking essential components subject to the requirements of Section 5.5.7 of Rule 4401, if an operator has minimized a leak but the leak still exceeds the applicable leak limits as defined in Section 3.0 of Rule 4401, an operator shall comply with at least one of the following requirements as soon as practicable but not later than the time period specified in Table 3 of Rule 4401: Repair or replace the leaking component; or vent the leaking component to a VOC collection and control system as defined in Section 3.0 of Rule 4401, or remove the leaking component from operation. [District Rule 4401, 5.5.4] Federally Enforceable Through Title V Permit
50. The repair period in calendar days shall not exceed 14 days for minor gas leaks, 5 days for major gas leaks less than or equal to 50,000 ppmv, 2 days for gas leak greater than 50,000 ppmv, 3 days for minor liquid leaks, 2 days for major liquid leaks. [District Rule 4401, 5.5.4] Federally Enforceable Through Title V Permit
51. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period specified in Table 3 of Rule 4401. [District Rule 4401, 5.5.5] Federally Enforceable Through Title V Permit
52. The time of the initial leak detection shall be the start of the repair period specified in Table 3 of Rule 4401. [District Rule 4401, 5.5.6] Federally Enforceable Through Title V Permit
53. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401, 5.5.7] Federally Enforceable Through Title V Permit
54. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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55. 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 as defined in Section 3.0 of Rule 4401. [District Rule 4401, 6.1.3] Federally Enforceable Through Title V Permit
56. Operator of any steam-enhanced crude oil production well shall keep an inspection log maintained pursuant to Section 6.4 of Rule 4401. [District Rule 4401, 6.1.4] Federally Enforceable Through Title V Permit
57. Records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, instrument reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration shall be maintained. [District Rule 4401, 6.1.5] Federally Enforceable Through Title V Permit
58. An operator shall maintain copies at the facility of the training records of the training program operated pursuant to Section 6.5 of Rule 4401. [District Rule 4401, 6.1.6] Federally Enforceable Through Title V Permit
59. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401, 6.1.7] Federally Enforceable Through Title V Permit
60. Operator shall keep a list of all gauge tanks, as defined in Section 3.17 of Rule 4401. The list shall contain the size, identification number, the location of each gauge tank and specify whether the gauge tank is upstream of all front line production equipment. [District Rule 4401, 6.1.8] Federally Enforceable Through Title V Permit
61. The results of gauge tank TVP testing conducted pursuant to Section 6.2.3 shall be submitted to the APCO within 60 days after the completion of the testing. [District Rule 4401, 6.1.9] Federally Enforceable Through Title V Permit
62. 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. An 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, 6.1.10] Federally Enforceable Through Title V Permit
63. An 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. A process system as defined in Section 3.30 of Rule 4401 is not subject to compliance source testing requirements. [District Rule 4401, 6.2.1] Federally Enforceable Through Title V Permit
64. If approved by EPA, ARB, and the APCO, an operator need not comply with the annual testing requirement of Section 6.2.1 if all uncondensed VOC emissions collected by a vapor collection are controlled by an internal combustion engine subject to Rule 4702, a combustion device subject to Rule 4320, 4307 or 4308, a flare subject to Rule 4311. [District Rule 4401, 6.2.2] Federally Enforceable Through Title V Permit
65. An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.17 of Rule 4401: Conduct periodic TVP testing of each gauge tank 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 Section 6.4 of Rule 4623 (Storage of Organic Liquids). The operator shall submit the TVP testing results to the APCO as specified in Section 6.1.9 of Rule 4401. [District Rule 4401, 6.2.3] Federally Enforceable Through Title V Permit
66. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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67. 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
68. 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
69. 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, 6.3.4] Federally Enforceable Through Title V Permit
70. Operator shall maintain an inspection log in which an operator records, at a minimum, all of the following information for each inspection performed: The total number of components inspected, total number and percentage of leaking components found by component type, location, type, and name or description of each leaking component and description of any unit where the leaking component is found, date of leak detection and the method of leak detection. For gaseous leaks, the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak. the date of repair, replacement, or removal from operation of leaking components, identify 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 earlier, methods 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, the date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced, the inspector's name, business mailing address, and business telephone number, date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401, 6.4] Federally Enforceable Through Title V Permit
71. Permittee 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
72. In accordance with the approved Operator Management Plan (OMP), permittee shall meet all applicable operating, leak standards, inspection and re-inspection, leak repair, record keeping, and notification requirements of Rule 4401. [District Rule 4401, 6.6] Federally Enforceable Through Title V Permit
73. By January 30 of each year, permittee 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
74. 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
75. The concentration of sulfur compounds in the exhaust from combustion equipment shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall do one of the following: fire the unit only on PUC or FERC regulated natural gas; or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels; or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rules 4801 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
76. The requirements of SJVUAPCD Rule 4407 (Adopted 5/19/94) and SJVUAPCD Rule 4801 (Adopted 12/17/92) do not apply to the well vents. For Rule 4801 applicability, well vent emissions are fugitive emissions not considered to come from a point source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] 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-1372-316-16

EXPIRATION DATE: 05/31/2016

SECTION: NW10 **TOWNSHIP:** 29S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

TEOR OPERATION SERVING 236 STEAM ENHANCED WELLS, WELL COLLECTION PIPING, FLARE, WELL VENT VAPOR CONTROL SYSTEM VAPOR PIPING TO FLARE, HEAT EXCHANGERS, GAS/LIQUID SEPARATORS, SCRUBBER, COMPRESSORS, LUBE OIL TANK AND SULFA TREAT SYSTEM (HOPKINS LEASE)

PERMIT UNIT REQUIREMENTS

1. Casing vapor collection system shall be equipped with vapor flowrate indicator/recorder downstream of condensible recovery system measuring total flowrate. [District NSR Rule] Federally Enforceable Through Title V Permit
2. TEOR gas shall only be incinerated in steam generators S-1372-1, '-319 or flare. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Steam generator #3, permit # S-1372-1, shall not operate when flare is incinerating TEOR waste gas. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Collected condensate shall be discharged into production pipeline. [District Rule 2201] Federally Enforceable Through Title V Permit
5. VOC content of the collected well vent vapor shall not exceed 10% by weight. [District Rules 2201 and 4401] Federally Enforceable Through Title V Permit
6. Emission rates from flare shall not exceed the following: PM10: 13.7 lb/MMscf, SOx (as SO2): 193.5 lb/day, NOx (as NO2): 140 lb/MMscf, VOC: 2.8 lb/MMscf, CO: 11.0 lb/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The following test method shall be used for fuel gas sulfur content - ASTM D3246 or double GC for H2S and mercaptans. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. The flare shall be operated according to the manufacturer's specifications, a copy of which shall be maintained on site. [District Rule 2520, 9.3.3] Federally Enforceable Through Title V Permit
9. The flare in this permit shall be inspected every two weeks while in operation for visible emissions. If visible emissions are observed, corrective action shall be taken. If visible emissions continue, an EPA method 9 test shall be conducted within 72 hours. [District Rule 2520, 9.3.1] Federally Enforceable Through Title V Permit
10. Permittee shall maintain accurate records of well casing vapor H2S concentration (periodic sampling of no less than once per quarter), daily volume of casing vapor incinerated and resulting daily SO2 emissions. [District Rule 1070 and 2520, 9.4.1] Federally Enforceable Through Title V Permit
11. Flare shall comply with all of the applicable requirements of Rule 4311. [District Rule 4311] Federally Enforceable Through Title V Permit
12. The 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

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13. The flare outlet shall be equipped with an automatic ignition system, or, shall operate with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rule 4311, 5.3] Federally Enforceable Through Title V Permit
14. Except for flares equipped with a flow-sensing ignition system, a 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 installed and operated. [District Rule 4311, 5.4] Federally Enforceable Through Title V Permit
15. Flares using flow-sensing automatic ignition systems and not using a continuous flame pilot shall use purge gas for purging. [District Rule 4311, 5.5] Federally Enforceable Through Title V Permit
16. Open flares (air-assisted, steam-assisted, or non-assisted) in which the flare gas pressure is less than 5 psig shall be operated in such a manner that meets the provisions of 40 CFR 60.18. [District Rule 4311, 5.6] Federally Enforceable Through Title V Permit
17. Flaring is prohibited unless it is consistent with an approved flare minimization plan (FMP), pursuant to Rule 4311, Section 6.5, and all commitments listed in that plan have been met. This standard shall not apply if the APCO determines that the flaring is caused by an emergency as defined by Section 3.7 and is necessary to prevent an accident, hazard or release of vent gas directly to the atmosphere [District Rule 4311, 5.8] Federally Enforceable Through Title V Permit
18. The operator of a flare subject to flare minimization requirements pursuant to Section 5.8 shall monitor the vent gas flow to the flare with a flow measuring device or other parameters as specified in the Permit to Operate. The operator shall maintain records pursuant to Section 6.1.7. Flares that the operator can verify, based on permit conditions, are not capable of producing reportable flare events pursuant to Section 6.2.2 shall not be required to monitor vent gas flow to the flare. [District Rule 4311, 5.10] Federally Enforceable Through Title V Permit
19. The following records shall be maintained, retained on-site for a minimum of five years, and made available to the APCO, ARB, and EPA upon request: 1) A copy of the compliance determination conducted pursuant to Section 6.4.1, 2) For flares used during an emergency, record of the duration of flare operation, amount of gas burned, and the nature of the emergency situation, 3) A copy of the approved flare minimization plan pursuant to Section 6.5, 4) On and after July 1, 2012, where applicable, a copy of annual reports submitted to the APCO pursuant to Section 6.2, and 5) Where applicable, monitoring data collected pursuant to Sections 5.10. [District Rule 4311, 6.1] Federally Enforceable Through Title V Permit
20. The operator of a flare subject to flare minimization plans pursuant to Section 5.8 of Rule 4311 shall notify the APCO of an unplanned flaring event within 24 hours after the start of the next business day or within 24 hours of their discovery, whichever occurs first. The notification shall include the flare source identification, the start date and time, and the end date and time. [District Rule 4311, 6.2.1] Federally Enforceable Through Title V Permit
21. The operator of a flare subject to flare minimization plans pursuant to Section 5.8 shall submit an annual report to the APCO that summarizes all Reportable Flaring Events as defined in Section 3.0 that occurred during the previous 12 month period. The report shall be submitted within 30 days following the end of the twelve month period of the previous year. The report shall include, but is not limited to all of the following: 1) The results of an investigation to determine the primary cause and contributing factors of the flaring event; 2) Any prevention measures considered or implemented to prevent recurrence together with a justification for rejecting any measures that were considered but not implemented; 3) If appropriate, an explanation of why the flaring was an emergency and necessary to prevent accident, hazard or release of vent gas to the atmosphere, or where, due to a regulatory mandate to vent a flare, it cannot be recovered, treated and used as a fuel gas at the facility; and 4) The date, time, and duration of the flaring event. [District Rule 4311, 6.2.2] Federally Enforceable Through Title V Permit

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22. The operator of a flare subject to flare monitoring requirements pursuant to Rule 4311, Sections 5.10, 6.6, 6.7, 6.8, 6.9, and 6.10, as appropriate, shall submit an annual report to the APCO within 30 days following the end of each 12 month period. The report shall include the following: 1) The total volumetric flow of vent gas in standard cubic feet for each day, 2) Hydrogen sulfide content, methane content, and hydrocarbon content of vent gas composition pursuant to Section 6.6, 3) If vent gas composition is monitored by a continuous analyzer or analyzers pursuant to Section 5.11, average total hydrocarbon content by volume, average methane content by volume, and depending upon the analytical method used pursuant to Section 6.3.4, total reduced sulfur content by volume or hydrogen sulfide content by volume of vent gas flared for each hour of the month, 4) If the flow monitor used pursuant to Section 5.10 measures molecular weight, the average molecular weight for each hour of each month, 5) For any pilot and purge gas used, the type of gas used, the volumetric flow for each day and for each month, and the means used to determine flow, 6) Flare monitoring system downtime periods, including dates and times, 7) For each day and for each month provide calculated sulfur dioxide emissions, and 8) A flow verification report for each flare subject to this rule. The flow verification report shall include flow verification testing pursuant to Section 6.3.5. [District Rule 4311, 6.2.3] Federally Enforceable Through Title V Permit
23. Total hydrocarbon content and methane content of vent gas shall be determined using ASTM Method D 1945-96, ASTM Method UOP 539-97, EPA Method 18, or EPA Method 25A or 25B. Hydrogen sulfide content of vent gas shall be determined using ASTM Method D 1945-96, ASTM Method UOP 539-97, ASTM Method D 4084-94, or ASTM Method D 4810-88. [District Rule 4311, 6.3.4] Federally Enforceable Through Title V Permit
24. Upon request, the operator of flares that are subject to Section 5.6 shall make available to the APCO the compliance determination records that demonstrate compliance with the provisions of 40 CFR 60.18, (c)(3) through (c)(5). [District Rule 4311, 6.4.1] Federally Enforceable Through Title V Permit
25. Permittee shall maintain with the permit a current listing of all steam enhanced wells connected to the casing vent control system and shall make such listing readily available for District inspection upon request. [District Rule 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
26. Permittee shall maintain accurate component count for TEOR operation according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors. Permittee shall update such records when new components are installed. [District Rule 2201] Federally Enforceable Through Title V Permit
27. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the emission control requirements of District Rule 4401. [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
28. The inspection requirements of Section 5.4.1 through Section 5.4.7 of Rule 4401 shall not apply to components exclusively handling gas/vapor or liquid with a VOC content of ten percent by weight (10%) or less, as determined by the test methods in Section 6.3.4 of Rule 4401. [District Rule 4401, 4.7] Federally Enforceable Through Title V Permit
29. Gas and liquid leaks are as defined in Section 3.20 of Rule 4401. [District Rule 4401, 3.20] Federally Enforceable Through Title V Permit
30. An operator shall not operate a steam-enhanced crude oil production well unless the operator complies with either of the following requirements: The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401, the well vent may be 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, or the steam-enhanced crude oil production well vent is open and the well vent is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401] 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.

Permit Unit Requirements for S-1372-316-16 (continued)

31. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of 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 as defined by Section 5.2.2.1 of Rule 4401 requiring process fluid flow through the open-ended lines, a component with a major liquid leak, or a component with a gas leak greater than 50,000 ppmv. [District Rule 4401] Federally Enforceable Through Title V Permit
32. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of any combination of components with minor liquid leaks, minor gas leaks, or a gas leaks greater than 10,000 ppmv up to 50,000 ppmv that totals more than number of leaks allowed by Table 2 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
33. An operator shall not use any component with a leak as defined in Section 3.0 of Rule 4401, or that is found to be in violation of the provisions of Section 5.2.2 of Rule 4401. However, components that were found leaking may be used provided such leaking components have been identified with a tag for repair, are repaired, or awaiting re-inspection after being repaired within the applicable time frame specified in Section 5.5 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
34. 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 with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401] Federally Enforceable Through Title V Permit
35. An operator shall comply with the requirements of Section 6.7 of Rule 4401 if there is any change in the description of major components or critical components. [District Rule 4401] Federally Enforceable Through Title V Permit
36. Except for pipes and unsafe-to-monitor components, an operator shall inspect all other components pursuant to the requirements of Section 6.3.3 of Rule 4401 at least once every year. [District Rule 4401] Federally Enforceable Through Title V Permit
37. An operator shall visually inspect all pipes 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 the time frame specified in Table 3 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
38. In addition to the inspections required by Section 5.4.1 of Rule 4401, an operator shall inspect for leaks all accessible operating pumps, compressors, and PRDs in service as follows: An 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. 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 the time frame specified in Table 3 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
39. In addition to the inspections required by Sections 5.4.1, 5.4.2 and 5.4.3 of Rule 4401, operator shall perform the following: 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, re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection, inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. Except for PRDs subject to the requirements of Section 5.4.4.1 of Rule 4401, an operator shall inspect a component that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. [District Rule 4401] Federally Enforceable Through Title V Permit
40. An operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401] Federally Enforceable Through Title V Permit
41. 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] 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.

Permit Unit Requirements for S-1372-316-16 (continued)

42. An operator shall affix a readily visible weatherproof tag to a leaking component upon detection of the leak and shall include the following information on the tag: date and time of leak detection, date and time of leak measurement, for a gaseous leak, the leak concentration in ppmv, for a liquid leak, whether it is a major liquid leak or a minor liquid leak, whether the component is an essential component, an unsafe-to monitor component, or a critical component. [District Rule 4401] Federally Enforceable Through Title V Permit
43. An operator shall keep the tag affixed to the component until an operator has met all of the following conditions: repaired or replaced the leaking component, re-inspected the component using the test method in Section 6.3.3, and the component is found to be in compliance with the requirements of this rule. [District Rule 4401] Federally Enforceable Through Title V Permit
44. An operator shall minimize a component leak in order to stop or reduce leakage to the atmosphere immediately to the extent possible, but not later than one (1) hour after detection of the leak. [District Rule 4401] Federally Enforceable Through Title V Permit
45. Except for leaking critical components or leaking essential components subject to the requirements of Section 5.5.7 of Rule 4401, if an operator has minimized a leak but the leak still exceeds the applicable leak limits as defined in Section 3.0 of Rule 4401, an operator shall comply with at least one of the following requirements as soon as practicable but not later than the time period specified in Table 3 of Rule 4401: Repair or replace the leaking component; or vent the leaking component to a VOC collection and control system as defined in Section 3.0 of Rule 4401, or remove the leaking component from operation. [District Rule 4401] Federally Enforceable Through Title V Permit
46. The repair period in calendar days shall not exceed 14 days for minor gas leaks, 5 days for major gas leaks less than or equal to 50,000 ppmv, 2 days for gas leak greater than 50,000 ppmv, 3 days for minor liquid leaks, 2 days for major liquid leaks. [District Rule 4401] Federally Enforceable Through Title V Permit
47. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period specified in Table 3 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
48. The time of the initial leak detection shall be the start of the repair period specified in Table 3 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
49. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401] Federally Enforceable Through Title V Permit
50. 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] Federally Enforceable Through Title V Permit
51. 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 as defined in Section 3.0 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
52. Operator of any steam-enhanced crude oil production well shall keep an inspection log maintained pursuant to Section 6.4 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
53. Records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, instrument reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration shall be maintained. [District Rule 4401] Federally Enforceable Through Title V Permit
54. An operator shall maintain copies at the facility of the training records of the training program operated pursuant to Section 6.5 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
55. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401] 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.

56. Operator shall keep a list of all gauge tanks, as defined in Section 3.17 of Rule 4401. The list shall contain the size, identification number, the location of each gauge tank and specify whether the gauge tank is upstream of all front line production equipment. [District Rule 4401] Federally Enforceable Through Title V Permit
57. The results of gauge tank TVP testing conducted pursuant to Section 6.2.3 shall be submitted to the APCO within 60 days after the completion of the testing. [District Rule 4401] Federally Enforceable Through Title V Permit
58. 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. An 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] Federally Enforceable Through Title V Permit
59. An 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. A process system as defined in Section 3.30 of Rule 4401 is not subject to compliance source testing requirements. [District Rule 4401] Federally Enforceable Through Title V Permit
60. If approved by EPA, ARB, and the APCO, an operator need not comply with the annual testing requirement of Section 6.2.1 if all uncondensed VOC emissions collected by a vapor collection are controlled by an internal combustion engine subject to Rule 4702, a combustion device subject to Rule 4320, 4307 or 4308, a flare subject to Rule 4311. [District Rule 4401] Federally Enforceable Through Title V Permit
61. An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.17 of Rule 4401: Conduct periodic TVP testing of each gauge tank 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 Section 6.4 of Rule 4623 (Storage of Organic Liquids). The operator shall submit the TVP testing results to the APCO as specified in Section 6.1.9 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
62. 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] Federally Enforceable Through Title V Permit
63. 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] Federally Enforceable Through Title V Permit
64. 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] Federally Enforceable Through Title V Permit
65. Operator shall conduct quarterly sampling of the collected well vent vapor. If samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during period of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rules 2201 and 4401] 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.

66. 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] Federally Enforceable Through Title V Permit
67. Operator shall maintain an inspection log in which an operator records, at a minimum, all of the following information for each inspection performed: The total number of components inspected, total number and percentage of leaking components found by component type, location, type, and name or description of each leaking component and description of any unit where the leaking component is found, date of leak detection and the method of leak detection. For gaseous leaks, the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak. the date of repair, replacement, or removal from operation of leaking components, identify 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 earlier, methods 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, the date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced, the inspector's name, business mailing address, and business telephone number, date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401] Federally Enforceable Through Title V Permit
68. Permittee shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures, as necessary. [District Rule 4401] Federally Enforceable Through Title V Permit
69. In accordance with the approved Operator Management Plan (OMP), permittee shall meet all applicable operating, leak standards, inspection and re-inspection, leak repair, record keeping, and notification requirements of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
70. By January 30 of each year, permittee shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4401] Federally Enforceable Through Title V Permit
71. 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
72. The requirements of SJVUAPCD Rule 4407 (Adopted 5/19/94) and SJVUAPCD Rule 4801 (Adopted 12/17/92) do not apply to the well vents. For Rule 4801 applicability, well vent emissions are fugitive emissions not considered to come from a point source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

APPENDIX B
HRA Summary

San Joaquin Valley Air Pollution Control District Risk Management Review

To: Steve Davidson – Permit Services
 From: Cheryl Lawler – Technical Services
 Date: February 11, 2016
 Facility Name: Freeport McMoran
 Location: SW/4 Section 22, T32S, R23E
 Application #(s): S-1372-312-14 & 316-18
 Project #: S-1160245

A. RMR SUMMARY

RMR Summary				
Categories	Increase TEOR Wells (Unit 312-14)	Increase TEOR Wells (Unit 316-18)	Project Totals	Facility Totals
Prioritization Score	0.01	0.02	0.03	>1.0
Acute Hazard Index	0.00	0.00	0.01	0.12
Chronic Hazard Index	0.00	0.00	0.00	0.05
Maximum Individual Cancer Risk	6.31E-09	8.39E-09	1.47E-08	4.77E-06
T-BACT Required?	No	No		
Special Permit Requirements?	No	No		

B. RMR REPORT

I. Project Description

Technical Services received a request on February 10, 2016, to perform a Risk Management Review for a proposal to increase the number of TEOR wells.

II. Analysis

Toxic emissions for this project were calculated using VOC fugitive emission rates provided by the processing engineer, along with District approved emission factors for fugitive emissions from oilfields. Emissions were then input into the San Joaquin Valley APCD's Hazard Assessment and Reporting Program (SHARP). In accordance with the District's Risk Management Policy for Permitting New and Modified Sources (APR 1905, May 28, 2015), risks from the project were prioritized using the procedures in the 1990 CAPCOA Facility Prioritization Guidelines. The facilitywide cumulative prioritization scores totaled to greater than 1.0 (see RMR Summary Table). Therefore, a refined health risk assessment was required. The AERMOD model was used, with the parameters outlined below and meteorological data for 2004-2008 from Fellows to determine the dispersion factors (i.e., the predicted concentration or X divided by the normalized

source strength or Q) for a receptor grid. These dispersion factors were input into the SHARP Program, which then used the Air Dispersion Modeling and Risk Tool (ADMRT) of the Hot Spots Analysis and Reporting Program Version 2 (HARP 2) to calculate the chronic and acute hazard indices and the carcinogenic risk for the project.

The following parameters were used for the review:

Analysis Parameters Units 312-14 & 316-18 (each unit)			
Source Type	Area	Location Type	Rural
X-Length (m)	25	Closest Receptor (m)	1207
Y-Length (m)	25	Type of Receptor	Business
Release Height (m)	1	Pollutant Type	VOC
Unit 312-14 VOC Fugitive Emission Rates (lbs)	0.46 hr 4015 yr	Unit 316-18 VOC Fugitive Emission Rates (lbs)	0.6 hr 5293 yr

III. Conclusion

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

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

IV. Attachments

- A. RMR Request Form
- B. Prioritization
- C. Facility Summary

APPENDIX C
Quarterly Net Emissions Change (QNEC)

Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The QNEC shall be calculated as follows:

QNEC = PE2 - PE1, where:

- QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.
- PE2 = Post Project Potential to Emit for each emissions unit, lb/qtr.
- PE1 = Pre-Project Potential to Emit for each emissions unit, lb/qtr.

Using the values in Sections VII.C.2 and VII.C.6 in the evaluation above, quarterly PE2 and quarterly PE1 can be calculated as follows:

$$\begin{aligned}
 PE2_{\text{quarterly}} &= PE2_{\text{annual}} \div 4 \text{ quarters/year} \\
 &= 0 \text{ lb/year} \div 4 \text{ qtr/year} \\
 &= 0 \text{ lb VOC/qtr}
 \end{aligned}$$

$$\begin{aligned}
 PE1_{\text{quarterly}} &= PE1_{\text{annual}} \div 4 \text{ quarters/year} \\
 &= 0 \text{ lb/year} \div 4 \text{ qtr/year} \\
 &= 0 \text{ lb VOC/qtr}
 \end{aligned}$$

S-1372-312-14 Quarterly NEC [QNEC]			
	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
NO _x	0	0	0
SO _x	0	0	0
PM ₁₀	0	0	0
CO	0	0	0
VOC	0	0	0

S-1372-316-18 Quarterly NEC [QNEC]			
	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
NO _x	0	0	0
SO _x	0	0	0
PM ₁₀	0	0	0
CO	0	0	0
VOC	0	0	0

APPENDIX D
Compliance Certification



**San Joaquin Valley
Unified Air Pollution Control District**

RECEIVED
FEB 25 2015
SJVAPCD
Southern Region
**HEALTHY
AIR
LIVING**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE AMENDMENT
 MINOR PERMIT MODIFICATION

COMPANY NAME: Freeport-McMoRan Oil & Gas LLC	FACILITY ID: S- 1372
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Freeport-McMoRan Oil & Gas LLC	
3. Agent to the Owner: Steven P. Rusch	

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

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

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

Signature of Responsible Official

2/23/15
Date

Steven P. Rusch
Name of Responsible Official (please print)

Vice President EHS & Government Affairs
Title of Responsible Official (please print)

APPENDIX E
Gas analysis

GENERAL GAS ANALYSIS (C-6 +) [2,3,8]

GHG Compliant
Rule (40 CFR Part 98)

ELAP Cert.1396-A

Rev 03/27/13

Customer: FMOG
Address: 1200 Discovery Drive, Suite 500
Bakersfield, CA 93309
Attention: Tom Kalderberg/Herb Thompson
Sample Description: Keene Williams Sulfa Treat In , Temp 77°F, Pressure 12 psig

Log #: 29280-4
Date Received: 8/5/15
Date Completed: 8/5/15
Report Date: 8/5/15

Constituent		Mole %	Wt %	Lv %
Oxygen/Argon	O2 / Ar	0.047	0.056	0.025
Nitrogen	N2	0.460	0.476	0.298
Carbon Dioxide	CO2	36.548	59.460	36.673
Carbon Monoxide	CO	0.000	0.000	0.000
Methane	C-1	57.711	34.224	57.524
Ethane	C-2	1.311	1.457	2.061
Propane	C-3	0.483	0.787	0.782
Iso-Butane	C-4	0.491	1.054	0.944
N-Butane	C-4	0.088	0.189	0.163
Neo Pentane	C-5	0.031	0.084	0.071
Iso-Pentane	C-5	0.097	0.259	0.209
N-Pentane	C-5	0.037	0.098	0.079
Hexanes Plus	C-6 (+)	0.210	0.722	0.538
Hydrogen	H ₂	1.687	0.126	0.000
Hydrogen Sulfide	H ₂ S	0.798	1.006	0.635
Total		100.000	100.000	100.000

[1,2]	Hydrogen Sulfide, H ₂ S =	ppmv 7,984	Grains H ₂ S 100 cu.ft. 508.182	**** VOC's (% by wt.C-3+) 3.194	[5] Water Content (lbs/MM C.F.) 1,822
[1,2]	Total Sulfur, as H ₂ S =	8,380	Grains 'S' 100 cu.ft. 502.130		
[4,6,7,8]	Physical Data	<u>dry</u>	<u>wet</u>	<u>dry</u>	<u>wet</u>
	*** BTU cu.ft. ideal =	665.30	653.72	599.91	589.48
	*** BTU cu.ft. real =	667.46	655.85	601.86	591.39
	BTU/lb, ideal =	9,252.32	9,091.33		** GPM C-2+ = 0.8223
	(Density) Sp. Gr. Ideal =	0.9338	0.9176		** GPM C-3+ = 0.4726
	(Density) Sp. Gr. Real =	0.9365	0.9202		** GPM C-4+ = 0.3399
	Density lbm/(1000 ft ³) =	71.281	70.041		** GPM C-5+ = 0.1521
	C-H-O-N-S	<u>% by Wt.</u>			z..factor = 0.9968
	% Carbon =	45.666			* F..factor (60°F) DSCF/MM Btu = 9,112
	% Hydrogen =	9.623			* F..factor (68°F) DSCF/MM Btu = 9,251
	% Oxygen =	43.289			Sp.Vol. Cu.Ft./Lb = 13.92
	% Nitrogen =	0.476			Av. Mol. Wt. = 27.05
	% Sulfur =	0.946			
	Total =	100.000			

QC-Ck	Measured	Range
1. Fidelity Ck =	0.99	(0.97-1.11)
2. Cont area Ck =	8.7E+06	(8.3 - 9.2)E+6
3. Un-Norm Sum =	101.3	(95 - 105)

Notes:

- * F..factor = dcf/MMBTU (CARB)
- ** GPM = Gallons Per 1000 Ft³
- *** Hexane (+) BTU Calc. using GPA 2261 Constant
- **** VOC's Volatile Organic Constituents
- N.R. = "Not Requested"
- Density-Specific Gravity where Air = 1.0000
- DSCF = Dry Standard Cubic Feet
- MM = 1 Million

References

1. ASTM D6228-10
2. ASTM D1945-03(2010)
3. ASTM D1946-90(2011)
4. ASTM D3588-98(2011)
5. ASTM D1142-95(2012)
6. GPA 2172-96
7. GPA 2145-09
8. GPA 2261-00

QC _____ Date _____

All Calculations Tabulated @ 60/60
dry, 14.696psia
(288.15°K, 101.325kPa)

Date: _____

Kurt R. Buckle, Laboratory Director Midway Laboratory, Inc.

GENERAL GAS ANALYSIS (C-6 +) [2,3,8]

GHG Compliant
Rule (40 CFR Part 98)

ELAP Cert.1396-A

Rev 03/27/13

Customer: FMOG
Address: 1200 Discovery Drive Suite 500
Bakersfield, CA 93309
Attention: Lyle Stockton
Sample Description: Scrubber In Vessel #585 Temperature 106°F, Pressure 10 psig

Log #: 29100-1
Date Received: 7/2/15
Date Completed: 7/2/15
Report Date: 7/2/15

Constituent		Mole %	Wt %	Lv %
Oxygen/Argon	O2 / Ar	0.061	0.070	0.032
Nitrogen	N2	0.416	0.414	0.270
Carbon Dioxide	CO2	40.604	63.447	40.822
Carbon Monoxide	CO	0.000	0.000	0.000
Methane	C-1	52.422	29.858	52.354
Ethane	C-2	2.307	2.463	3.634
Propane	C-3	0.338	0.530	0.549
Iso-Butane	C-4	0.050	0.103	0.096
N-Butane	C-4	0.097	0.199	0.179
Neo Pentane	C-5	0.001	0.003	0.002
Iso-Pentane	C-5	0.044	0.113	0.095
N-Pentane	C-5	0.148	0.379	0.316
Hexanes Plus	C-6 (+)	0.430	1.423	1.106
Hydrogen	H ₂	2.399	0.172	0.000
Hydrogen Sulfide	H ₂ S	0.683	0.827	0.544
Total		100.000	100.000	100.000

[1,2]	Hydrogen Sulfide, H ₂ S =	ppmv 6,830	Grains H ₂ S 100 cu.ft. 434.730	**** VOC's (% by wt.C-3+) 2.750	[5] Water Content (lbs/MM C.F.) NR
[1,2]	Total Sulfur, as H ₂ S =	7,424	Grains 'S' 100 cu.ft. 444.846		
[4,6,7,8]	Physical Data	dry	Gross BTU	dry	Net BTU
	*** BTU cu.ft. ideal =	625.93	wet 615.04	564.32	wet 554.50
	*** BTU cu.ft. real =	628.06	617.14	566.25	556.39
	BTU/lb, ideal =	8,323.65	8,178.82		** GPM C-2+ = 1.0121
	(Density) Sp. Gr. Ideal =	0.9724	0.9555		** GPM C-3+ = 0.3968
	(Density) Sp. Gr. Real =	0.9754	0.9584		** GPM C-4+ = 0.3038
	Density lbm/(1000 ft ³) =	74.215	72.924		** GPM C-5+ = 0.2572
					z.factor = 0.9966
				* F..factor (60°F)	DSCF/MM Btu = 9,233
				* F..factor (68°F)	DSCF/MM Btu = 9,374
					Sp.Vol. Cu.Ft./Lb = 13.38
					Av. Mol. Wt. = 28.16
	C-H-O-N-S	% by Wt.		QC-Ck	Measured Range
	% Carbon =	43.939		1. Fidelity Ck. =	0.99 (0.97-1.11)
	% Hydrogen =	8.668		2. Cont area Ck =	8.7E+06 (8.3 - 9.2)E+6
	% Oxygen =	46.201		3. Un-Norm Sum =	103.5 (95 - 105)
	% Nitrogen =	0.414			
	% Sulfur =	0.778			
	Total =	100.000			

Notes:

- * F..factor = dcf/MMBTU (CARB)
- ** GPM = Gallons Per 1000 Ft³
- *** Hexane (+) BTU Calc. using GPA 2261 Constant
- **** VOC's Volatile Organic Constituents
- N.R.= "Not Requested"
- Density-Specific Gravity where Air = 1.0000
- DSCF = Dry Standard Cubic Feet
- MM = 1 Million

References

1. ASTM D6228-10
2. ASTM D1945-03(2010)
3. ASTM D1946-90(2011)
4. ASTM D3588-98(2011)
5. ASTM D1142-95(2012)
6. GPA 2172-96
7. GPA 2145-09
8. GPA 2261-00

QC _____ Date _____

All Calculations Tabulated @ 60/60
dry, 14.696psia
(288.15°K, 101.325kPa)

Date: _____

Kurt R. Buckle, Laboratory Director Midway Laboratory, Inc.

APPENDIX F
Draft ATCs

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1372-312-14

LEGAL OWNER OR OPERATOR: FREEPORT-MC MORAN OIL & GAS
MAILING ADDRESS: 1200 DISCOVERY DRIVE, SUITE 500
BAKERSFIELD, CA 93309

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
CA

SECTION: SW22 **TOWNSHIP:** 32S **RANGE:** 23E

EQUIPMENT DESCRIPTION:

MODIFICATION OF TEOR OPERATION INCLUDING 120 STEAM ENHANCED WELLS, WELL VENT VAPOR CONTROL SYSTEM, WELL COLLECTION PIPING, STANDBY FLARE, VAPOR PIPING TO S-1372-17 AND STANDBY FLARE, THREE-PHASE SEPARATORS, HEAT EXCHANGERS, GAS/LIQUID SEPARATORS, STORAGE VESSELS, COMPRESSORS, LUBE OIL TANKS, AND PUMPS (KEENE-KELLY-SOUTH CERRITOS-WILLIAMS LEASES): INCREASE WELL COUNT TO 165

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. All equipment shall be constructed, maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Permittee shall maintain with the permit a current listing of all steam enhanced wells connected to the casing vent control system and shall make such listing readily available for District inspection upon request. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director, APCO

Arnaud Marjolle, Director of Permit Services
S-1372-312-14, Feb 24 2016 2:50PM -- KLEVANNND : Joint Inspection NOT Required

Conditions for S-1372-312-14 (continued)

5. VOC content of the collected TEOR vapors shall not exceed 10% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit
6. VOC content of TEOR gas shall be tested not less than quarterly thereafter. If compliance with the 10% VOC content limit has been demonstrated for 8 consecutive quarters, then the testing frequency shall be annually. If an annual source test fails to show compliance, quarterly testing shall resume. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
7. Total uncontrolled VOC emissions from all well vents shall be reduced by at least 99%. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Permittee shall maintain a written record of VOC content of the TEOR gas. [District NSR Rule and District Rule 9.3.2] Federally Enforceable Through Title V Permit
9. Operation shall include sulfa check system, to be used when necessary to meet sulfur compounds limits of standby flare and steam generators S-1372-17. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The compressed gas knockout scrubber shall precede the steam generator S-1372-17 and standby flare. [District Rule NSR] Federally Enforceable Through Title V Permit
11. Standby flare shall only be used to incinerate TEOR vapors when steam generator permit S-1372-17 is inoperative. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Oxides of sulfur emissions shall not exceed 1578.1 b/day as SO₂ from the following steam generators: S-1372-8, '17, '18, '19, '20 and standby flare S-1372-312. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Permittee shall maintain accurate records of well casing vapor H₂S concentration (periodic sampling of no less than once per quarter) and daily volume of casing vapor incinerated. [District Rule 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. The following test method shall be used for fuel gas sulfur content - ASTM D3246 or double GC for H₂S and mercaptans. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. The flare in this permit shall be inspected every two weeks while in operation for visible emissions. If visible emissions are observed, corrective action shall be taken. If visible emissions continue, an EPA method 9 test shall be conducted within 72 hours. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. 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
17. Flare shall comply with all of the applicable requirements of Rule 4311. [District Rule 4311] Federally Enforceable Through Title V Permit
18. The 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
19. The flare outlet shall be equipped with an automatic ignition system, or, shall operate with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rule 4311, 5.3] Federally Enforceable Through Title V Permit
20. Except for flares equipped with a flow-sensing ignition system, a 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 installed and operated. [District Rule 4311, 5.4] Federally Enforceable Through Title V Permit
21. Flares using flow-sensing automatic ignition systems and not using a continuous flame pilot shall use purge gas for purging. [District Rule 4311, 5.5] Federally Enforceable Through Title V Permit
22. Open flares (air-assisted, steam-assisted, or non-assisted) in which the flare gas pressure is less than 5 psig shall be operated in such a manner that meets the provisions of 40 CFR 60.18. [District Rule 4311, 5.6] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

23. Flaring is prohibited unless it is consistent with an approved flare minimization plan (FMP), pursuant to Rule 4311, Section 6.5, and all commitments listed in that plan have been met. This standard shall not apply if the APCO determines that the flaring is caused by an emergency as defined by Section 3.7 and is necessary to prevent an accident, hazard or release of vent gas directly to the atmosphere [District Rule 4311, 5.8] Federally Enforceable Through Title V Permit
24. The operator of a flare subject to flare minimization requirements pursuant to Section 5.8 shall monitor the vent gas flow to the flare with a flow measuring device or other parameters as specified in the Permit to Operate. The operator shall maintain records pursuant to Section 6.1.7. Flares that the operator can verify, based on permit conditions, are not capable of producing reportable flare events pursuant to Section 6.2.2 shall not be required to monitor vent gas flow to the flare. [District Rule 4311, 5.10] Federally Enforceable Through Title V Permit
25. The following records shall be maintained, retained on-site for a minimum of five years, and made available to the APCO, ARB, and EPA upon request: 1) A copy of the compliance determination conducted pursuant to Section 6.4.1, 2) For flares used during an emergency, record of the duration of flare operation, amount of gas burned, and the nature of the emergency situation, 3) A copy of the approved flare minimization plan pursuant to Section 6.5, 4) On and after July 1, 2012, where applicable, a copy of annual reports submitted to the APCO pursuant to Section 6.2, and 5) Where applicable, monitoring data collected pursuant to Sections 5.10. [District Rule 4311, 6.1] Federally Enforceable Through Title V Permit
26. The operator of a flare subject to flare minimization plans pursuant to Section 5.8 of Rule 4311 shall notify the APCO of an unplanned flaring event within 24 hours after the start of the next business day or within 24 hours of their discovery, whichever ever occurs first. The notification shall include the flare source identification, the start date and time, and the end date and time. [District Rule 4311, 6.2.1] Federally Enforceable Through Title V Permit
27. Effective on and after July 1, 2012, and annually thereafter, the operator of a flare subject to flare minimization plans pursuant to Section 5.8 shall submit an annual report to the APCO that summarizes all Reportable Flaring Events as defined in Section 3.0 that occurred during the previous 12 month period. The report shall be submitted within 30 days following the end of the twelve month period of the previous year. The report shall include, but is not limited to all of the following: 1) The results of an investigation to determine the primary cause and contributing factors of the flaring event; 2) Any prevention measures considered or implemented to prevent recurrence together with a justification for rejecting any measures that were considered but not implemented; 3) If appropriate, an explanation of why the flaring was an emergency and necessary to prevent accident, hazard or release of vent gas to the atmosphere, or where, due to a regulatory mandate to vent a flare, it cannot be recovered, treated and used as a fuel gas at the facility; and 4) The date, time, and duration of the flaring event. [District Rule 4311, 6.2.2] Federally Enforceable Through Title V Permit
28. Effective on and after July 1, 2012, and annually thereafter, the operator of a flare subject to flare monitoring requirements pursuant to Rule 4311, Sections 5.10, 6.6, 6.7, 6.8, 6.9, and 6.10, as appropriate, shall submit an annual report to the APCO within 30 days following the end of each 12 month period. The report shall include the following: 1) The total volumetric flow of vent gas in standard cubic feet for each day, 2) Hydrogen sulfide content, methane content, and hydrocarbon content of vent gas composition pursuant to Section 6.6, 3) If vent gas composition is monitored by a continuous analyzer or analyzers pursuant to Section 5.11, average total hydrocarbon content by volume, average methane content by volume, and depending upon the analytical method used pursuant to Section 6.3.4, total reduced sulfur content by volume or hydrogen sulfide content by volume of vent gas flared for each hour of the month, 4) If the flow monitor used pursuant to Section 5.10 measures molecular weight, the average molecular weight for each hour of each month, 5) For any pilot and purge gas used, the type of gas used, the volumetric flow for each day and for each month, and the means used to determine flow, 6) Flare monitoring system downtime periods, including dates and times, 7) For each day and for each month provide calculated sulfur dioxide emissions, and 8) A flow verification report for each flare subject to this rule. The flow verification report shall include flow verification testing pursuant to Section 6.3.5. [District Rule 4311, 6.2.3] Federally Enforceable Through Title V Permit
29. Total hydrocarbon content and methane content of vent gas shall be determined using ASTM Method D 1945-96, ASTM Method UOP 539-97, EPA Method 18, or EPA Method 25A or 25B. Hydrogen sulfide content of vent gas shall be determined using ASTM Method D 1945-96, ASTM Method UOP 539-97, ASTM Method D 4084-94, or ASTM Method D 4810-88. [District Rule 4311, 6.3.4] Federally Enforceable Through Title V Permit

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30. Upon request, the operator of flares that are subject to Section 5.6 shall make available to the APCO the compliance determination records that demonstrate compliance with the provisions of 40 CFR 60.18, (c)(3) through (c)(5). [District Rule 4311, 6.4.1] Federally Enforceable Through Title V Permit
31. Casing vapor collection system shall be equipped with vapor flowrate indicator/recorder downstream of condensible recovery system measuring total flowrate. [District NSR Rule and 1070] Federally Enforceable Through Title V Permit
32. Collected condensate shall be discharged into production pipeline. [District NSR Rule] Federally Enforceable Through Title V Permit
33. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the emission control requirements of District Rule 4401. [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
34. The inspection requirements of Section 5.4.1 through Section 5.4.7 of Rule 4401 shall not apply to components exclusively handling gas/vapor or liquid with a VOC content of ten percent by weight (10%) or less, as determined by the test methods in Section 6.3.4 of Rule 4401. [District Rule 4401, 4.7] Federally Enforceable Through Title V Permit
35. Gas and liquid leaks are as defined in Section 3.20 of Rule 4401. [District Rule 4401, 3.20] Federally Enforceable Through Title V Permit
36. An operator shall not operate a steam-enhanced crude oil production well unless the operator complies with either of the following requirements: The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401, the well vent may be 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, or the steam-enhanced crude oil production well vent is open and the well vent is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401, 5.1.1 and 5.1.2] Federally Enforceable Through Title V Permit
37. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of 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 as defined by Section 5.2.2.1 of Rule 4401 requiring process fluid flow through the open-ended lines, a component with a major liquid leak, or a component with a gas leak greater than 50,000 ppmv. [District Rule 4401, 5.2.2] Federally Enforceable Through Title V Permit
38. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of any combination of components with minor liquid leaks, minor gas leaks, or a gas leaks greater than 10,000 ppmv up to 50,000 ppmv that totals more than number of leaks allowed by Table 2 of Rule 4401. [District Rule 4401, 5.2.2] Federally Enforceable Through Title V Permit
39. An operator shall not use any component with a leak as defined in Section 3.0 of Rule 4401, or that is found to be in violation of the provisions of Section 5.2.2 of Rule 4401. However, components that were found leaking may be used provided such leaking components have been identified with a tag for repair, are repaired, or awaiting re-inspection after being repaired within the applicable time frame specified in Section 5.5 of Rule 4401. [District Rule 4401, 5.3.1] Federally Enforceable Through Title V Permit
40. 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 with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401, 5.3.2] Federally Enforceable Through Title V Permit
41. An operator shall comply with the requirements of Section 6.7 of Rule 4401 if there is any change in the description of major components or critical components. [District Rule 4401, 5.3.3] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

42. Except for pipes and unsafe-to-monitor components, an operator shall inspect all other components pursuant to the requirements of Section 6.3.3 of Rule 4401 at least once every year. [District Rule 4401, 5.4.1] Federally Enforceable Through Title V Permit
43. An operator shall visually inspect all pipes 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 the time frame specified in Table 3 of Rule 4401. [District Rule 4401, 5.4.2] Federally Enforceable Through Title V Permit
44. In addition to the inspections required by Section 5.4.1 of Rule 4401, an operator shall inspect for leaks all accessible operating pumps, compressors, and PRDs in service as follows: An 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. 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 the time frame specified in Table 3 of Rule 4401. [District Rule 4401, 5.4.3] Federally Enforceable Through Title V Permit
45. In addition to the inspections required by Sections 5.4.1, 5.4.2 and 5.4.3 of Rule 4401, operator shall perform the following: 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, re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection, inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. Except for PRDs subject to the requirements of Section 5.4.4.1 of Rule 4401, an operator shall inspect a component that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. [District Rule 4401, 5.4.4] Federally Enforceable Through Title V Permit
46. An operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401, 5.4.7] Federally Enforceable Through Title V Permit
47. 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, 5.4.8] Federally Enforceable Through Title V Permit
48. An operator shall affix a readily visible weatherproof tag to a leaking component upon detection of the leak and shall include the following information on the tag: date and time of leak detection, date and time of leak measurement, for a gaseous leak, the leak concentration in ppmv, for a liquid leak, whether it is a major liquid leak or a minor liquid leak, whether the component is an essential component, an unsafe-to monitor component, or a critical component. [District Rule 4401, 5.5.1] Federally Enforceable Through Title V Permit
49. An operator shall keep the tag affixed to the component until an operator has met all of the following conditions: repaired or replaced the leaking component, re-inspected the component using the test method in Section 6.3.3, and the component is found to be in compliance with the requirements of this rule. [District Rule 4401 5.5.2] Federally Enforceable Through Title V Permit
50. An operator shall minimize a component leak in order to stop or reduce leakage to the atmosphere immediately to the extent possible, but not later than one (1) hour after detection of the leak. [District Rule 4401, 5.5.3] Federally Enforceable Through Title V Permit
51. Except for leaking critical components or leaking essential components subject to the requirements of Section 5.5.7 of Rule 4401, if an operator has minimized a leak but the leak still exceeds the applicable leak limits as defined in Section 3.0 of Rule 4401, an operator shall comply with at least one of the following requirements as soon as practicable but not later than the time period specified in Table 3 of Rule 4401: Repair or replace the leaking component; or vent the leaking component to a VOC collection and control system as defined in Section 3.0 of Rule 4401, or remove the leaking component from operation. [District Rule 4401, 5.5.4] Federally Enforceable Through Title V Permit
52. The repair period in calendar days shall not exceed 14 days for minor gas leaks, 5 days for major gas leaks less than or equal to 50,000 ppmv, 2 days for gas leak greater than 50,000 ppmv, 3 days for minor liquid leaks, 2 days for major liquid leaks. [District Rule 4401, 5.5.4] Federally Enforceable Through Title V Permit

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53. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period specified in Table 3 of Rule 4401. [District Rule 4401, 5.5.5] Federally Enforceable Through Title V Permit
54. The time of the initial leak detection shall be the start of the repair period specified in Table 3 of Rule 4401. [District Rule 4401, 5.5.6] Federally Enforceable Through Title V Permit
55. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401, 5.5.7] Federally Enforceable Through Title V Permit
56. 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
57. 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 as defined in Section 3.0 of Rule 4401. [District Rule 4401, 6.1.3] Federally Enforceable Through Title V Permit
58. Operator of any steam-enhanced crude oil production well shall keep an inspection log maintained pursuant to Section 6.4 of Rule 4401. [District Rule 4401, 6.1.4] Federally Enforceable Through Title V Permit
59. Records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, instrument reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration shall be maintained. [District Rule 4401, 6.1.5] Federally Enforceable Through Title V Permit
60. An operator shall maintain copies at the facility of the training records of the training program operated pursuant to Section 6.5 of Rule 4401. [District Rule 4401, 6.1.6] Federally Enforceable Through Title V Permit
61. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401, 6.1.7] Federally Enforceable Through Title V Permit
62. Operator shall keep a list of all gauge tanks, as defined in Section 3.17 of Rule 4401. The list shall contain the size, identification number, the location of each gauge tank and specify whether the gauge tank is upstream of all front line production equipment. [District Rule 4401, 6.1.8] Federally Enforceable Through Title V Permit
63. The results of gauge tank TVP testing conducted pursuant to Section 6.2.3 shall be submitted to the APCO within 60 days after the completion of the testing. [District Rule 4401, 6.1.9] Federally Enforceable Through Title V Permit
64. 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. An 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, 6.1.10] Federally Enforceable Through Title V Permit
65. An 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. A process system as defined in Section 3.30 of Rule 4401 is not subject to compliance source testing requirements. [District Rule 4401, 6.2.1] Federally Enforceable Through Title V Permit
66. If approved by EPA, ARB, and the APCO, an operator need not comply with the annual testing requirement of Section 6.2.1 if all uncondensed VOC emissions collected by a vapor collection are controlled by an internal combustion engine subject to Rule 4702, a combustion device subject to Rule 4320, 4307 or 4308, a flare subject to Rule 4311. [District Rule 4401, 6.2.2] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

67. An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.17 of Rule 4401: Conduct periodic TVP testing of each gauge tank 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 Section 6.4 of Rule 4623 (Storage of Organic Liquids). The operator shall submit the TVP testing results to the APCO as specified in Section 6.1.9 of Rule 4401. [District Rule 4401, 6.2.3] Federally Enforceable Through Title V Permit
68. 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
69. 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
70. 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
71. 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, 6.3.4] Federally Enforceable Through Title V Permit
72. Operator shall maintain an inspection log in which an operator records, at a minimum, all of the following information for each inspection performed: The total number of components inspected, total number and percentage of leaking components found by component type, location, type, and name or description of each leaking component and description of any unit where the leaking component is found, date of leak detection and the method of leak detection. For gaseous leaks, the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak. the date of repair, replacement, or removal from operation of leaking components, identify 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 earlier, methods 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, the date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced, the inspector's name, business mailing address, and business telephone number, date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401, 6.4] Federally Enforceable Through Title V Permit
73. Permittee 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
74. In accordance with the approved Operator Management Plan (OMP), permittee shall meet all applicable operating, leak standards, inspection and re-inspection, leak repair, record keeping, and notification requirements of Rule 4401. [District Rule 4401, 6.6] Federally Enforceable Through Title V Permit
75. By January 30 of each year, permittee 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

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76. {1294} 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
77. The concentration of sulfur compounds in the exhaust from combustion equipment shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall do one of the following: fire the unit only on PUC or FERC regulated natural gas; or test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels; or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rules 4801 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
78. The requirements of SJVUAPCD Rule 4407 (Adopted 5/19/94) and SJVUAPCD Rule 4801 (Adopted 12/17/92) do not apply to the well vents. For Rule 4801 applicability, well vent emissions are fugitive emissions not considered to come from a point source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
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PERMIT NO: S-1372-316-18

LEGAL OWNER OR OPERATOR: FREEPORT-MC MORAN OIL & GAS
MAILING ADDRESS: 1200 DISCOVERY DRIVE, SUITE 500
BAKERSFIELD, CA 93309

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
CA

SECTION: NW10 **TOWNSHIP:** 29S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

MODIFICATION OF TEOR OPERATION SERVING 236 STEAM ENHANCED WELLS, WELL COLLECTION PIPING, FLARE, WELL VENT VAPOR CONTROL SYSTEM VAPOR PIPING TO FLARE, HEAT EXCHANGERS, GAS/LIQUID SEPARATORS, SCRUBBER, COMPRESSORS, LUBE OIL TANK AND SULFA TREAT SYSTEM (HOPKINS LEASE): INCREASE WELL COUNT TO 285

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Casing vapor collection system shall be equipped with vapor flowrate indicator/recorder downstream of condensible recovery system measuring total flowrate. [District NSR Rule] Federally Enforceable Through Title V Permit
4. TEOR gas shall only be incinerated in steam generators S-1372-1, '-319 or flare. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Steam generator #3, permit # S-1372-1, shall not operate when flare is incinerating TEOR waste gas. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Collected condensate shall be discharged into production pipeline. [District Rule 2201] Federally Enforceable Through Title V Permit

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

Seyed Sadredin, Executive Director, APCO

Arnaud Marjolle, Director of Permit Services
S-1372-316-18 : Feb 24 2016 2:50PM -- KLEVAAND : Joint Inspection NOT Required

7. VOC content of the collected well vent vapor shall not exceed 10% by weight. [District Rules 2201 and 4401] Federally Enforceable Through Title V Permit
8. Emission rates from flare shall not exceed the following: PM10: 13.7 lb/MMscf, SO_x (as SO₂): 193.5 lb/day, NO_x (as NO₂): 140 lb/MMscf, VOC: 2.8 lb/MMscf, CO: 11.0 lb/MMscf. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The following test method shall be used for fuel gas sulfur content - ASTM D3246 or double GC for H₂S and mercaptans. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. The flare shall be operated according to the manufacturer's specifications, a copy of which shall be maintained on site. [District Rule 2520, 9.3.3] Federally Enforceable Through Title V Permit
11. The flare in this permit shall be inspected every two weeks while in operation for visible emissions. If visible emissions are observed, corrective action shall be taken. If visible emissions continue, an EPA method 9 test shall be conducted within 72 hours. [District Rule 2520, 9.3.1] Federally Enforceable Through Title V Permit
12. Permittee shall maintain accurate records of well casing vapor H₂S concentration (periodic sampling of no less than once per quarter), daily volume of casing vapor incinerated and resulting daily SO₂ emissions. [District Rule 1070 and 2520, 9.4.1] Federally Enforceable Through Title V Permit
13. Flare shall comply with all of the applicable requirements of Rule 4311. [District Rule 4311] Federally Enforceable Through Title V Permit
14. The 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
15. The flare outlet shall be equipped with an automatic ignition system, or, shall operate with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rule 4311, 5.3] Federally Enforceable Through Title V Permit
16. Except for flares equipped with a flow-sensing ignition system, a 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 installed and operated. [District Rule 4311, 5.4] Federally Enforceable Through Title V Permit
17. Flares using flow-sensing automatic ignition systems and not using a continuous flame pilot shall use purge gas for purging. [District Rule 4311, 5.5] Federally Enforceable Through Title V Permit
18. Open flares (air-assisted, steam-assisted, or non-assisted) in which the flare gas pressure is less than 5 psig shall be operated in such a manner that meets the provisions of 40 CFR 60.18. [District Rule 4311, 5.6] Federally Enforceable Through Title V Permit
19. Flaring is prohibited unless it is consistent with an approved flare minimization plan (FMP), pursuant to Rule 4311, Section 6.5, and all commitments listed in that plan have been met. This standard shall not apply if the APCO determines that the flaring is caused by an emergency as defined by Section 3.7 and is necessary to prevent an accident, hazard or release of vent gas directly to the atmosphere [District Rule 4311, 5.8] Federally Enforceable Through Title V Permit
20. The operator of a flare subject to flare minimization requirements pursuant to Section 5.8 shall monitor the vent gas flow to the flare with a flow measuring device or other parameters as specified in the Permit to Operate. The operator shall maintain records pursuant to Section 6.1.7. Flares that the operator can verify, based on permit conditions, are not capable of producing reportable flare events pursuant to Section 6.2.2 shall not be required to monitor vent gas flow to the flare. [District Rule 4311, 5.10] Federally Enforceable Through Title V Permit
21. The following records shall be maintained, retained on-site for a minimum of five years, and made available to the APCO, ARB, and EPA upon request: 1) A copy of the compliance determination conducted pursuant to Section 6.4.1, 2) For flares used during an emergency, record of the duration of flare operation, amount of gas burned, and the nature of the emergency situation, 3) A copy of the approved flare minimization plan pursuant to Section 6.5, 4) On and after July 1, 2012, where applicable, a copy of annual reports submitted to the APCO pursuant to Section 6.2, and 5) Where applicable, monitoring data collected pursuant to Sections 5.10. [District Rule 4311, 6.1] Federally Enforceable Through Title V Permit

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22. The operator of a flare subject to flare minimization plans pursuant to Section 5.8 of Rule 4311 shall notify the APCO of an unplanned flaring event within 24 hours after the start of the next business day or within 24 hours of their discovery, whichever occurs first. The notification shall include the flare source identification, the start date and time, and the end date and time. [District Rule 4311, 6.2.1] Federally Enforceable Through Title V Permit
23. The operator of a flare subject to flare minimization plans pursuant to Section 5.8 shall submit an annual report to the APCO that summarizes all Reportable Flaring Events as defined in Section 3.0 that occurred during the previous 12 month period. The report shall be submitted within 30 days following the end of the twelve month period of the previous year. The report shall include, but is not limited to all of the following: 1) The results of an investigation to determine the primary cause and contributing factors of the flaring event; 2) Any prevention measures considered or implemented to prevent recurrence together with a justification for rejecting any measures that were considered but not implemented; 3) If appropriate, an explanation of why the flaring was an emergency and necessary to prevent accident, hazard or release of vent gas to the atmosphere, or where, due to a regulatory mandate to vent a flare, it cannot be recovered, treated and used as a fuel gas at the facility; and 4) The date, time, and duration of the flaring event. [District Rule 4311, 6.2.2] Federally Enforceable Through Title V Permit
24. The operator of a flare subject to flare monitoring requirements pursuant to Rule 4311, Sections 5.10, 6.6, 6.7, 6.8, 6.9, and 6.10, as appropriate, shall submit an annual report to the APCO within 30 days following the end of each 12 month period. The report shall include the following: 1) The total volumetric flow of vent gas in standard cubic feet for each day, 2) Hydrogen sulfide content, methane content, and hydrocarbon content of vent gas composition pursuant to Section 6.6, 3) If vent gas composition is monitored by a continuous analyzer or analyzers pursuant to Section 5.11, average total hydrocarbon content by volume, average methane content by volume, and depending upon the analytical method used pursuant to Section 6.3.4, total reduced sulfur content by volume or hydrogen sulfide content by volume of vent gas flared for each hour of the month, 4) If the flow monitor used pursuant to Section 5.10 measures molecular weight, the average molecular weight for each hour of each month, 5) For any pilot and purge gas used, the type of gas used, the volumetric flow for each day and for each month, and the means used to determine flow, 6) Flare monitoring system downtime periods, including dates and times, 7) For each day and for each month provide calculated sulfur dioxide emissions, and 8) A flow verification report for each flare subject to this rule. The flow verification report shall include flow verification testing pursuant to Section 6.3.5. [District Rule 4311, 6.2.3] Federally Enforceable Through Title V Permit
25. Total hydrocarbon content and methane content of vent gas shall be determined using ASTM Method D 1945-96, ASTM Method UOP 539-97, EPA Method 18, or EPA Method 25A or 25B. Hydrogen sulfide content of vent gas shall be determined using ASTM Method D 1945-96, ASTM Method UOP 539-97, ASTM Method D 4084-94, or ASTM Method D 4810-88. [District Rule 4311, 6.3.4] Federally Enforceable Through Title V Permit
26. Upon request, the operator of flares that are subject to Section 5.6 shall make available to the APCO the compliance determination records that demonstrate compliance with the provisions of 40 CFR 60.18, (c)(3) through (c)(5). [District Rule 4311, 6.4.1] Federally Enforceable Through Title V Permit
27. Permittee shall maintain with the permit a current listing of all steam enhanced wells connected to the casing vent control system and shall make such listing readily available for District inspection upon request. [District Rule 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
28. Permittee shall maintain accurate component count for TEOR operation according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors. Permittee shall update such records when new components are installed. [District Rule 2201] Federally Enforceable Through Title V Permit
29. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the emission control requirements of District Rule 4401. [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
30. The inspection requirements of Section 5.4.1 through Section 5.4.7 of Rule 4401 shall not apply to components exclusively handling gas/vapor or liquid with a VOC content of ten percent by weight (10%) or less, as determined by the test methods in Section 6.3.4 of Rule 4401. [District Rule 4401, 4.7] Federally Enforceable Through Title V Permit
31. Gas and liquid leaks are as defined in Section 3.20 of Rule 4401. [District Rule 4401, 3.20] Federally Enforceable Through Title V Permit

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32. An operator shall not operate a steam-enhanced crude oil production well unless the operator complies with either of the following requirements: The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401, the well vent may be 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, or the steam-enhanced crude oil production well vent is open and the well vent is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
33. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of 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 as defined by Section 5.2.2.1 of Rule 4401 requiring process fluid flow through the open-ended lines, a component with a major liquid leak, or a component with a gas leak greater than 50,000 ppmv. [District Rule 4401] Federally Enforceable Through Title V Permit
34. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of any combination of components with minor liquid leaks, minor gas leaks, or a gas leaks greater than 10,000 ppmv up to 50,000 ppmv that totals more than number of leaks allowed by Table 2 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
35. An operator shall not use any component with a leak as defined in Section 3.0 of Rule 4401, or that is found to be in violation of the provisions of Section 5.2.2 of Rule 4401. However, components that were found leaking may be used provided such leaking components have been identified with a tag for repair, are repaired, or awaiting re-inspection after being repaired within the applicable time frame specified in Section 5.5 of Rule 4401. [District Rule 4401] 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 with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401] Federally Enforceable Through Title V Permit
37. An operator shall comply with the requirements of Section 6.7 of Rule 4401 if there is any change in the description of major components or critical components. [District Rule 4401] Federally Enforceable Through Title V Permit
38. Except for pipes and unsafe-to-monitor components, an operator shall inspect all other components pursuant to the requirements of Section 6.3.3 of Rule 4401 at least once every year. [District Rule 4401] Federally Enforceable Through Title V Permit
39. An operator shall visually inspect all pipes 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 the time frame specified in Table 3 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
40. In addition to the inspections required by Section 5.4.1 of Rule 4401, an operator shall inspect for leaks all accessible operating pumps, compressors, and PRDs in service as follows: An 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. 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 the time frame specified in Table 3 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit

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41. In addition to the inspections required by Sections 5.4.1, 5.4.2 and 5.4.3 of Rule 4401, operator shall perform the following: 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, re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection, inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. Except for PRDs subject to the requirements of Section 5.4.4.1 of Rule 4401, an operator shall inspect a component that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. [District Rule 4401] Federally Enforceable Through Title V Permit
42. An operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401] Federally Enforceable Through Title V Permit
43. 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] Federally Enforceable Through Title V Permit
44. An operator shall affix a readily visible weatherproof tag to a leaking component upon detection of the leak and shall include the following information on the tag: date and time of leak detection, date and time of leak measurement, for a gaseous leak, the leak concentration in ppmv, for a liquid leak, whether it is a major liquid leak or a minor liquid leak, whether the component is an essential component, an unsafe-to monitor component, or a critical component. [District Rule 4401] Federally Enforceable Through Title V Permit
45. An operator shall keep the tag affixed to the component until an operator has met all of the following conditions: repaired or replaced the leaking component, re-inspected the component using the test method in Section 6.3.3, and the component is found to be in compliance with the requirements of this rule. [District Rule 4401] Federally Enforceable Through Title V Permit
46. An operator shall minimize a component leak in order to stop or reduce leakage to the atmosphere immediately to the extent possible, but not later than one (1) hour after detection of the leak. [District Rule 4401] Federally Enforceable Through Title V Permit
47. Except for leaking critical components or leaking essential components subject to the requirements of Section 5.5.7 of Rule 4401, if an operator has minimized a leak but the leak still exceeds the applicable leak limits as defined in Section 3.0 of Rule 4401, an operator shall comply with at least one of the following requirements as soon as practicable but not later than the time period specified in Table 3 of Rule 4401: Repair or replace the leaking component; or vent the leaking component to a VOC collection and control system as defined in Section 3.0 of Rule 4401, or remove the leaking component from operation. [District Rule 4401] Federally Enforceable Through Title V Permit
48. The repair period in calendar days shall not exceed 14 days for minor gas leaks, 5 days for major gas leaks less than or equal to 50,000 ppmv, 2 days for gas leak greater than 50,000 ppmv, 3 days for minor liquid leaks, 2 days for major liquid leaks. [District Rule 4401] Federally Enforceable Through Title V Permit
49. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period specified in Table 3 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
50. The time of the initial leak detection shall be the start of the repair period specified in Table 3 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
51. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401] Federally Enforceable Through Title V Permit
52. 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] Federally Enforceable Through Title V Permit
53. 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 as defined in Section 3.0 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit

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54. Operator of any steam-enhanced crude oil production well shall keep an inspection log maintained pursuant to Section 6.4 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
55. Records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, instrument reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration shall be maintained. [District Rule 4401] Federally Enforceable Through Title V Permit
56. An operator shall maintain copies at the facility of the training records of the training program operated pursuant to Section 6.5 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
57. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401] Federally Enforceable Through Title V Permit
58. Operator shall keep a list of all gauge tanks, as defined in Section 3.17 of Rule 4401. The list shall contain the size, identification number, the location of each gauge tank and specify whether the gauge tank is upstream of all front line production equipment. [District Rule 4401] Federally Enforceable Through Title V Permit
59. The results of gauge tank TVP testing conducted pursuant to Section 6.2.3 shall be submitted to the APCO within 60 days after the completion of the testing. [District Rule 4401] Federally Enforceable Through Title V Permit
60. 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. An 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] Federally Enforceable Through Title V Permit
61. An 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. A process system as defined in Section 3.30 of Rule 4401 is not subject to compliance source testing requirements. [District Rule 4401] Federally Enforceable Through Title V Permit
62. If approved by EPA, ARB, and the APCO, an operator need not comply with the annual testing requirement of Section 6.2.1 if all uncondensed VOC emissions collected by a vapor collection are controlled by an internal combustion engine subject to Rule 4702, a combustion device subject to Rule 4320, 4307 or 4308, a flare subject to Rule 4311. [District Rule 4401] Federally Enforceable Through Title V Permit
63. An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.17 of Rule 4401: Conduct periodic TVP testing of each gauge tank 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 Section 6.4 of Rule 4623 (Storage of Organic Liquids). The operator shall submit the TVP testing results to the APCO as specified in Section 6.1.9 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
64. 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] Federally Enforceable Through Title V Permit
65. 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] Federally Enforceable Through Title V Permit

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66. 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] Federally Enforceable Through Title V Permit
67. Operator shall conduct quarterly sampling of the collected well vent vapor. If samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during period of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rules 2201 and 4401] Federally Enforceable Through Title V Permit
68. 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] Federally Enforceable Through Title V Permit
69. Operator shall maintain an inspection log in which an operator records, at a minimum, all of the following information for each inspection performed: The total number of components inspected, total number and percentage of leaking components found by component type, location, type, and name or description of each leaking component and description of any unit where the leaking component is found, date of leak detection and the method of leak detection. For gaseous leaks, the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak. the date of repair, replacement, or removal from operation of leaking components, identify 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 earlier, methods 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, the date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced, the inspector's name, business mailing address, and business telephone number, date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401] Federally Enforceable Through Title V Permit
70. Permittee shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures, as necessary. [District Rule 4401] Federally Enforceable Through Title V Permit
71. In accordance with the approved Operator Management Plan (OMP), permittee shall meet all applicable operating, leak standards, inspection and re-inspection, leak repair, record keeping, and notification requirements of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
72. By January 30 of each year, permittee shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4401] Federally Enforceable Through Title V Permit
73. {1294} 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
74. The requirements of SJVUAPCD Rule 4407 (Adopted 5/19/94) and SJVUAPCD Rule 4801 (Adopted 12/17/92) do not apply to the well vents. For Rule 4801 applicability, well vent emissions are fugitive emissions not considered to come from a point source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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