San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

OCT 25 2013

Mr. Raymond Rodriguez
Occidental of Elk Hills, Inc.
PO Box 1001
Tupman, CA 93276

Re: Notice of Minor Title V Permit Modification
District Facility # S-2234
Project # S-1134083

Dear Mr. Rodriguez:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to modify Permit to Operate (PTO) S-2234-4-8 of the facility's current Title V operating permit. The modification involves clarifying condition 6 in the current permit so the vapor pressure limit does not apply when transferring liquefied petroleum gas (i.e. propane and butane) pursuant to District Rule 4624, Section 5.4.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V PTO S-2234-4-9, application, and previous Title V permit. This project will be finalized after the 45-day EPA comment period.

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

Thank you for your cooperation in this matter.

Sincerely,

for David Warner
Director of Permit Services

Enclosures

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

TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1134083

Engineer: Stephen Leonard
Date: October 23, 2013

Facility Number: S-2234
Facility Name: Occidental of Elk Hills, Inc.
Mailing Address: P O Box 1001
Tupman, CA 93276

Reviewed by AP SUPERVISOR
OCT 23 2013

Contact Name: Raymond Rodriguez
Phone: 661-763-6159

Responsible Official: Mike Glavin
Title: Environmental Team Lead

I. PROPOSAL

Occidental of Elk Hills, Inc. (OEHI) is proposing a Title V minor permit modification to modify a Permit to Operate (PTO) S-2234-4-8 of the facility's current Title V operating permit. The modification involves clarifying condition 6 in the current permit so that the vapor pressure limit of 18 inches water column pressure and 6 inches water column vacuum on the loading rack's vapor control system does not apply when transferring liquefied petroleum gas (i.e. propane and butane) pursuant to District Rule 4624, Section 5.4.

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

II. FACILITY LOCATION

The transfer rack is located at OEHI's 35R gas plant, SE ¼ Section 35, Township 30S, Range 23E near Tupman.

III. EQUIPMENT DESCRIPTION

S-2234-4-9: NATURAL GASOLINE, BUTANE, AND PROPANE LOADING RACK CONSISTING OF 7 LOADING ISLANDS, 7 LOADING STATIONS, 14 HOSES, 14 VAPOR RETURN LINES AND A VAPOR RECOVERY SYSTEM

IV. SCOPE OF EPA AND PUBLIC REVIEW

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

V. APPLICABLE REQUIREMENTS

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

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Condition # on current PTO S-2234-4-8	Condition # on proposed PTO S-2234-4-9	Condition is: New, Modified, or Removed	Reason for Change from current PTO
6	6	Modified	"..except when transferring liquefied petroleum gas" is added to the end of the condition to more accurately reflect District Rule 4624, Section 5.4 requirement.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

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

6. Do not seek to consolidate overlapping applicable requirements.

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

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

VIII. ATTACHMENTS

A. Proposed Modified Title V Operating Permit No. S-2234-4-9
B. Emissions Increases
C. Application
D. Previous Title V Operating Permit No. S-2234-4-8

ATTACHMENT A

Proposed Modified Title V Operating Permit No. S-2234-4-9

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-2234-4-9 **EXPIRATION DATE:** 10/31/2016

SECTION: NE35 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
NATURAL GASOLINE, BUTANE, AND PROPANE LOADING RACK CONSISTING OF 7 LOADING ISLANDS, 7 LOADING STATIONS, 14 HOSES, 14 VAPOR RETURN LINES AND A VAPOR RECOVERY SYSTEM

PERMIT UNIT REQUIREMENTS

1. Operation shall be equipped with two 15 hp product transfer pumps. [District Rule 2201] Federally Enforceable Through Title V Permit
2. VOC emissions from the vapor collection and control system shall be determined using 40CFR 60.503. "Test Methods and Procedures" and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 432, or ARB Method 2-4. After an initial compliance determination, determinations shall be made whenever an inspection reveals conditions indicative of performance less effective than that during previous compliance determinations. [District Rule 4624] Federally Enforceable Through Title V Permit
3. Loading rack shall incorporate vapor loss collection system. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Nitrogen purge system shall be a closed system such that all VOC's are displaced to the vapor control system via closed piping for reprocessing in S-2234-3. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The loading rack shall be equipped with bottom loading and a vapor collection and control system such that VOC emissions do not exceed 0.08 pounds per 1000 gallons of organic liquid with greatest vapor pressure loaded. [District Rule 4624 and Kern County Rule 413] Federally Enforceable Through Title V Permit
6. Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum except when transferring liquefied petroleum gas. [District Rule 4624] Federally Enforceable Through Title V Permit
7. All delivery tanks which previously contained organic liquids, including gasoline, with a TVP greater than 1.5 psia at loading conditions shall be filled only at Class 1 loading facilities using bottom loading equipment with a vapor collection and control system operating such that VOC emissions do not exceed 0.08 lb/1000 gallons loaded; or Class 2 loading facilities equipped with a system to control at least 95% of VOC displaced; and which operate so the delivery tank does not exceed 18 inches water column pressure nor 6 inches water column vacuum. [District Rule 4624] Federally Enforceable Through Title V Permit
8. Loading and vapor collection and control equipment shall be designed, installed, maintained and operated such that there are no leaks or excess organic liquid drainage at disconnection. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 10 mls per average of 3 consecutive disconnects. [District Rule 4624 and Kern County Rule 413] Federally Enforceable Through Title V Permit
9. Construction, reconstruction (as defined in District Rule 4001, amended January 19, 1995), or expansion of any top loading facility shall not be allowed. [District Rule 4624] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

10. Analysis of halogenated exempt compounds shall be by ARB Method 432. [District Rule 4624] Federally Enforceable Through Title V Permit

11. TVP shall be measured using Reid vapor pressure ASTM Method No. D-323-82 modified by maintaining the hot water bath at storage temperature. Where storage temperature is above 100 deg F, TVP may be determined by Reid Vapor pressure at 100 deg F and ARB approved calculations. [District Rule 4624] Federally Enforceable Through Title V Permit

12. TVP of crude oil with an API gravity less than 30ø as determined by API 2547, may be determined by Headspace Gas Chromatography using the procedures from ARB Evaluation of a Method for Determining Vapor Pressures of Petroleum Mixtures by Headspace Gas Chromatography, October 1990. [District Rule 4624] Federally Enforceable Through Title V Permit

13. During the loading of organic liquids, the operator shall perform and record the results of monthly leak inspections of the loading and vapor collection equipment at each loading arm. Leak inspections shall be conducted using sight, sound, smell and instrument methods to detect leaks. Instrument detection shall be conducted using EPA Method 21. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21 using the following calibration gases: A) Zero air (less than 10 ppm of hydrocarbon in air); and B) Mixture of methane and air at a concentration of about, but less than, 10,000 ppm methane. [District Rule 2520] Federally Enforceable Through Title V Permit

14. Corrective steps shall be taken at any time the operator observes excess drainage at disconnect. In addition, the operator shall perform and record the results of monthly drainage inspections at disconnect for each loading arm. If no excess drainage conditions are found during five consecutive monthly inspections, the drainage inspection frequency may be changed from monthly to quarterly. However, if one or more excess drainage condition is found during a quarterly inspection, the inspection frequency shall return to monthly. [District Rule 2520] Federally Enforceable Through Title V Permit

15. Drainage inspections shall be completed before 10:00 AM the day of inspection. Compliance shall be demonstrated by collecting all drainage at disconnect in a spouted container. The drainage shall be transferred to a graduated cylinder and the volume determined within one (1) minute of collection. [District Rule 2520] Federally Enforceable Through Title V Permit

16. Each detected leak shall be repaired within 15 calendar days of detection. [District Rule 2520] Federally Enforceable Through Title V Permit

17. The permittee shall maintain an inspection log containing at least the following: A) dates of leak and drainage inspections, B) leak determination method, C) findings, D) corrective action (date each leak or excess drainage condition repaired, reasons for any leak repair interval in excess of 15 days), and E) inspector name and signature. [District Rule 2520] Federally Enforceable Through Title V Permit

18. All records necessary to determine compliance with the VOC emission limit for this unit shall be maintained for a period of at least 5 years and shall include component counts and recognized emission factors for fugitive emission sources. [District Rule 2520] Federally Enforceable Through Title V Permit

19. The loading rack's vapor collection and control system (VCCS) shall be tested annually to demonstrate the pressure in the delivery tanks being loaded complies with the requirements specified in this permit. Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other instrument demonstrated to be equivalent, capable of measuring up to 500 mm water gauge pressure with a precision of + or - 2.5 mm water gauge, on the terminal's VCCS at a pressure tap as close as possible to the connection with the product tank truck. The highest instantaneous pressure measurement as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. Every loading position must be tested at least once during the annual performance test. [District Rule 2520] Federally Enforceable Through Title V Permit

20. Compliance with these permit conditions in the Title V permit shall be deemed compliance with the requirements of Kern County Rule 413. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit

DRAFT

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

21. Compliance with these permit conditions in the Title V permit shall be deemed compliance with the following requirements: District Rule 4624 (as amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit

DRAFT

Occidental of Elk Hills, Inc.
S-2234
S-1134083

ATTACHMENT B

Emissions Increases

Occidental of Elk Hills, Inc.
S-2234
S-1134083

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
S-2234-4-9	0	0	0	0	0
TOTAL	**0**	**0**	**0**	**0**	**0**

Occidental of Elk Hills, Inc.
S-2234
S-1134083

ATTACHMENT C

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

RECEIVED
OCT 11 2013
SJVAPCD
Southern Region

Permit Application For:

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

1. PERMIT TO BE ISSUED TO:
Occidental of Elk Hills, Inc

2. MAILING ADDRESS:
STREET/P.O. BOX: PO Box 1001
CITY: Tupman STATE: CA 9-DIGIT ZIP CODE: 93276

3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:
STREET: CITY:
NE ¼ SECTION 35 TOWNSHIP 30S RANGE 23E

INSTALLATION DATE.

4. GENERAL NATURE OF BUSINESS: Oil and Natural Gas Production

5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE
(include Permit #'s if known, and use additional sheets if necessary)

Please revise PTO S-2234-4-8, Condition 6, to reflect Rule 4624, Section 5.4 requirement: "The vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and six (6) inches water column vacuum. This section shall not apply the transfer of liquefied petroleum gas."

6. TYPE OR PRINT NAME OF APPLICANT:
Raymond Rodriguez

TITLE OF APPLICANT:
Sr. Environmental Advisor

7. SIGNATURE OF APPLICANT: S. Rodriguez DATE: 10/11/2013

PHONE: (661) 763-6159
FAX: (661) 763-6681
EMAIL: raymond_rodriguez@oxy.com

Vector Environmental

For APCD Use Only:

DATE STAMP

FILING FEE RECEIVED: $ 71 — *CHECK#:* 9979
DATE PAID: 10/11/3
PROJECT NO: S1134083 *FACILITY ID:* S-2234

RECEIVED

OCT 1 1 2013

SJVAPCD
Southern Region

San Joaquin Valley
Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

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

COMPANY NAME: Occidental of Elk Hills, Inc	FACILITY ID: S - 2234
1. Type of Organization:[x] Corporation [ ] Sole Ownership [ ] Government [ ] Partnership [ ] Utility	
2. Owner's Name: Occidental of Elk Hills, Inc	
3. Agent to the Owner: Occidental of Elk Hills, Inc.	

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

(MG) 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).

(MG) 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.

(MG) Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

(MG) 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

10/11/2013
Date

Mike Glavin
Name of Responsible Official (please print)

Environmental Team Lead
Title of Responsible Official (please print)

OCCIDENTAL OF ELK HILLS, INC.
25890 Highway 119, PO Box 1001, Tupman, CA 93276
Telephone 661 763-6000

RECEIVED
OCT 11 2013
SJVAPCD
Southern Region

October 10, 2013

Mr. Leonard Scandura
Permit Services Manager
San Joaquin Valley Air Pollution Control District
Southern Regional Office
34969 Flyover Court
Bakersfield, CA 93308

RE: Clarification of Permit Conditional Requirements for S-2234-4-8

Dear Mr. Scandura:

Occidental of Elk Hills, Inc (OEHI) respectfully requests clarification regarding applicability of Permit S-2234-4-8, Condition 6. In particular, the requirement for loading racks associated with Butane and Propane loading.

Permit S-2234-4-8, Condition 6, states:

"The vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and six (6) inches water column vacuum. [District Rule 4624, 5.4]"

District Rule 4624, Section 5.4, states:

"The vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and six (6) inches water column vacuum. This section shall not apply to the transfer of liquefied petroleum gas."

It appears that the last sentence of Section 5.4 was inadvertently left out of the above referenced permit condition and therefore has caused some confusion with regard to potential non-compliance. The potential non-compliance issue is raised when trying to enforce the "18 inches water column pressure" requirement with regard to permitted loading racks that transfer Butane and Propane (i.e., Liquefied Petroleum Gas).

OEHI's preference would be for Permit Services to revise Permit S-2234-4-8, Condition 6, to reflect District Rule 4624 requirements. Please contact me let at (661) 763-6159 or on my cell (661) 204-9236 should you need any additional information that would help resolve this potential non-compliance issue.

Sincerely,

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

cc Richard Edgehill, SJVAPCD
Valarie Ballard, SJVAPCD

ATTACHMENT D

Previous Title V Operating Permit No. S-2234-4-8

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-2234-4-8 **EXPIRATION DATE:** 10/31/2016

SECTION: NE35 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
NATURAL GASOLINE, BUTANE, AND PROPANE LOADING RACK CONSISTING OF 7 LOADING ISLANDS, 7 LOADING STATIONS, 14 HOSES, 14 VAPOR RETURN LINES AND A VAPOR RECOVERY SYSTEM

PERMIT UNIT REQUIREMENTS

1. Operation shall be equipped with two 15 hp product transfer pumps. [District NSR Rule] Federally Enforceable Through Title V Permit
2. VOC emissions from the vapor collection and control system shall be determined using 40CFR 60.503. "Test Methods and Procedures" and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 432, or ARB Method 2-4. After an initial compliance determination, determinations shall be made whenever an inspection reveals conditions indicative of performance less effective than that during previous compliance determinations. [District Rule 4624, 6.2.2] Federally Enforceable Through Title V Permit
3. Loading rack shall incorporate vapor loss collection system. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Nitrogen purge system shall be a closed system such that all VOC's are displaced to the vapor control system via closed piping for reprocessing in S-2234-3. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The loading rack shall be equipped with bottom loading and a vapor collection and control system such that VOC emissions do not exceed 0.08 pounds per 1000 gallons of organic liquid with greatest vapor pressure loaded. [4624, 5.1.1 and Kern County Rule 413] Federally Enforceable Through Title V Permit
6. Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. [District Rule 4624, 5.4] Federally Enforceable Through Title V Permit
7. All delivery tanks which previously contained organic liquids, including gasoline, with a TVP greater than 1.5 psia at loading conditions shall be filled only at Class 1 loading facilities using bottom loading equipment with a vapor collection and control system operating such that VOC emissions do not exceed 0.08 lb/1000 gallons loaded; or Class 2 loading facilities equipped with a system to control at least 95% of VOC displaced; and which operate so the delivery tank does not exceed 18 inches water column pressure nor 6 inches water column vacuum. [District Rule 4624, 5.5] Federally Enforceable Through Title V Permit
8. Loading and vapor collection and control equipment shall be designed, installed, maintained and operated such that there are no leaks or excess organic liquid drainage at disconnections. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 10 mls per average of 3 consecutive disconnects. [District Rule 4624, 5.6 and Kern County Rule 413] Federally Enforceable Through Title V Permit
9. Construction, reconstruction (as defined in District Rule 4001, amended January 19, 1995), or expansion of any top loading facility shall not be allowed. [District Rule 4624, 5.7] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

10. Analysis of halogenated exempt compounds shall be by ARB Method 432. [District Rule 4624, 6.3.1] Federally Enforceable Through Title V Permit

11. TVP shall be measured using Reid vapor pressure ASTM Method No. D-323-82 modified by maintaining the hot water bath at storage temperature. Where storage temperature is above 100 deg F, TVP may be determined by Reid Vapor pressure at 100 deg F and ARB approved calculations. [District Rule 4624, 6.3.3] Federally Enforceable Through Title V Permit

12. TVP of crude oil with an API gravity less than 30ø as determined by API 2547, may be determined by Headspace Gas Chromatography using the procedures from ARB Evaluation of a Method for Determining Vapor Pressures of Petroleum Mixtures by Headspace Gas Chromatography, October 1990. [District Rule 4624, 6.3.4] Federally Enforceable Through Title V Permit

13. During the loading of organic liquids, the operator shall perform and record the results of monthly leak inspections of the loading and vapor collection equipment at each loading arm. Leak inspections shall be conducted using sight, sound, smell and instrument methods to detect leaks. Instrument detection shall be conducted using EPA Method 21. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21 using the following calibration gases: A) Zero air (less than 10 ppm of hydrocarbon in air); and B) Mixture of methane and air at a concentration of about, but less than, 10,000 ppm methane. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

14. Corrective steps shall be taken at any time the operator observes excess drainage at disconnect. In addition, the operator shall perform and record the results of monthly drainage inspections at disconnect for each loading arm. If no excess drainage conditions are found during five consecutive monthly inspections, the drainage inspection frequency may be changed from monthly to quarterly. However, if one or more excess drainage condition is found during a quarterly inspection, the inspection frequency shall return to monthly. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

15. Drainage inspections shall be completed before 10:00 AM the day of inspection. Compliance shall be demonstrated by collecting all drainage at disconnect in a spouted container. The drainage shall be transferred to a graduated cylinder and the volume determined within one (1) minute of collection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

16. Each detected leak shall be repaired within 15 calendar days of detection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

17. The permittee shall maintain an inspection log containing at least the following: A) dates of leak and drainage inspections, B) leak determination method, C) findings, D) corrective action (date each leak or excess drainage condition repaired, reasons for any leak repair interval in excess of 15 days), and E) inspector name and signature. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

18. All records necessary to determine compliance with the VOC emission limit for this unit shall be maintained for a period of at least 5 years and shall include component counts and recognized emission factors for fugitive emission sources. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

19. The loading rack's vapor collection and control system (VCCS) shall be tested annually to demonstrate the pressure in the delivery tanks being loaded complies with the requirements specified in this permit. Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other instrument demonstrated to be equivalent, capable of measuring up to 500 mm water gauge pressure with a precision of + or - 2.5 mm water gauge, on the terminal's VCCS at a pressure tap as close as possible to the connection with the product tank truck. The highest instantaneous pressure measurement as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. Every loading position must be tested at least once during the annual performance test. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

20. Compliance with these permit conditions in the Title V permit shall be deemed compliance with the requirements of Kern County Rule 413. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

21. Compliance with these permit conditions in the Title V permit shall be deemed compliance with the following requirements: District Rule 4624 (as amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

TITLE V MINOR MODIFICATION

PROJECT ROUTING FORM

FACILITY NAME: Occidental of Elk Hills Inc

FACILITY ID: S-2234 PROJECT NUMBER: S-1134083

PERMIT #'s: S-2234-4-9

DATE RECEIVED: October 11, 2013

PRELIMINARY REVIEW	ENGR	DATE	SUPR	DATE
A. Application Deemed Incomplete				
Second Information Letter				
B. Application Deemed Complete	SPL	10/23/2013		
C. Application Pending Denial				
D. Application Denied				

ENGINEERING EVALUATION	INITIAL	DATE
E. Engineering Evaluation Complete	SPL	10/23/2013
F. Supervising Engineer Approval	AP	10-25-13
G. Compliance Division Approval [x] Not Required		
H. Applicant's Review of Draft Authority to Construct Completed [ ] 3-day Review [ ] 10-day Review [x] No Review Requested		
I. Permit Services Regional Manager Approval	[illegible]	10/25

DIRECTOR REVIEW [x] Not Required	INITIAL	DATE
J. Preliminary Approval to Director		
K. Final Approval to Director		

PROJECT TRACKING FORM

Project No: S-1134083 **Project Type:** ***Authority to Construct***

Date	Initials	Given to	Description of Action Taken