



AUG 10 2011

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

**Re: Notice of Minor Title V Permit Modification
District Facility # S-2234
Project # S-1113370**

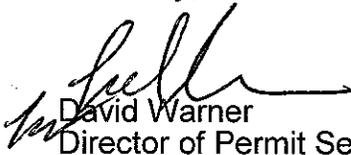
Dear Mr. Rios:

Enclosed for you to review is an application for a minor Title V permit modification for the facility identified above. Occidental of Elk Hills, Inc is proposing a Title V minor permit modification to incorporate the recently issued ATC S-2234-213-0 into the Title V operating permit. With this modification Occidental of Elk hills, Inc. will receive a Tittle V permit for the operation of a 14Z Wet Gas Compressor Station (14Z Station) at their S-2234 facility.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATC S-2234-213-0, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

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

Sincerely,



David Warner
Director of Permit Services

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93728-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

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



AUG 10 2011

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

**Re: Notice of Minor Title V Permit Modification
District Facility # S-2234
Project # S-1113370**

Dear Mr. Champion:

Enclosed is the District's analysis of your application for a minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued ATC S-2234-213-0 into the Title V operating permit. With this modification Occidental of Elk hills, Inc. will receive a Tittle V permit for the operation of a 14Z Wet Gas Compressor Station (14Z Station) at their S-2234 facility.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATC S-2234-213-0, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

Sincerely,



David Warner
Director of Permit Services

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Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1113370

Engineer: William Jones
Date: 7/21/11

Facility Number: S-2234
Facility Name: Occidental of Elk Hills, Inc
Mailing Address: 10800 Stockdale Hwy
Bakersfield, CA 93311

AD SUPP AQE

AUG 03 2011

Contact Name: Dennis J. Champion, PE
Phone: 661-412-5214

Responsible Official: Mike Glavin
Title: Environmental Team Lead

I. PROPOSAL

Occidental of Elk Hills, Inc is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct (ATC) S-2234-213-0 into the Title V operating permit. This ATC was included in project S-1102513.

Project S-1102513, included the installation of a wet gas compressor station and the modification of an existing permit for a glycol dehydration unit. The equipment will be located within the OEHI Gas Plant Stationary Source S-2234.

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

OEHI Gas Plant Stationary Source S-2234.
SE/4, Section 14, T30S/R22E, M.D.B. & M

III. EQUIPMENT DESCRIPTION

Proposed Title V Permit

ATC: S-2234-213-0: WET GAS COMPRESSOR 14Z STATION INCLUDING THE FOLLOWING PROCESS SYSTEMS INCLUDING A GAS INLET/CHILLER, GLYCOL DEHYDRATION SYSTEM AND JOULE-THOMPSON UNIT

Proposed modified Title V Permit

PTO: S-2234-213-1: WET GAS COMPRESSOR 14Z STATION INCLUDING THE FOLLOWING PROCESS SYSTEMS INCLUDING A GAS INLET/CHILLER, GLYCOL DEHYDRATION SYSTEM AND JOULE-THOMPSON UNIT

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

This is a new emissions unit. The following ATC S-2234-213-0 conditions will not be included on the PTO:

1. ~~{1829} The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Y~~
12. ~~No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] Y~~
13. ~~No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Y~~

- ~~20. This Authority to Construct (ATC) shall be issued concurrently with ATC S-2234-194-0, '194-1, '200-0, '200-1, '201-0, '201-1, '202-0, '202-1, '203-0 and '203-1. [District Rule 2201] Y~~
- ~~21. Prior to operating equipment under this Authority to Construct, the permittee shall surrender VOC emission reduction credits in the following quantities: 1st quarter 410 lb, 2nd quarter 410 lb, 3rd quarter 410 lb, and 4th quarter 410 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201] Y~~
- ~~22. ERC Certificate Number S-2822-1 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, at which time this Authority to Construct shall be administratively reissued, specifying the new offsetting proposal. [District Rule 2201] Y~~

Condition 1 has been satisfied with this project. Conditions 12 and 13 are addressed in the facility wide permit and are therefore not needed on each individual permit. Condition 20 has been satisfied with this project, conditions 21, and 22 are only relevant to the Authority to Construct, these ERC conditions have been satisfied before conversion of the ATC.

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-2234-213-1
- B. Authorities to Construct No. S-2234-213-0
- C. Emissions Increases
- D. Application

ATTACHMENT A

Proposed Modified Title V Operating Permit
No. S-2234-213-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2234-213-1

EXPIRATION DATE: 10/31/2009

SECTION: SE14 **TOWNSHIP:** 30S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

WET GAS COMPRESSOR 14Z STATION INCLUDING THE FOLLOWING PROCESS SYSTEMS INCLUDING A GAS INLET/CHILLER, GLYCOL DEHYDRATION SYSTEM AND JOULE-THOMPSON UNIT:

PERMIT UNIT REQUIREMENTS

1. 14Z Station Gas Inlet/Chiller System shall consist of inlet cooler, inlet separator, gas chiller, refrigerant reclaiming, refrigerant subcooler, refrigerant economizer, refrigerant suction scrubber, refrigerant accumulator, refrigerant condenser, refrigerant compressors (S-2234-200, -201, -202 and -203), oil separator, pumps and filters, pump down compressor, lube oil storage tank, lube oil pump, emergency vent stacks, propane loading station and drain tank. [District Rule 2201] Federally Enforceable Through Title V Permit
2. 14Z Glycol Dehydration System shall consist of glycol dehydration skid mounted unit with a glycol contactor, a separator coalescer, several glycol heat exchangers, a reboiler/regenerator equipped with 4.7 MMBtu/hr burner, a glycol surge tank, a flash separator, a lean/rich glycol exchanger, and various pumps and filters, with process vent connected to existing vacuum gas gathering system (S-2234-194) and Jatco BTEX System with condenser. [District Rule 2201] Federally Enforceable Through Title V Permit
3. 14Z Joule-Thomson Unit shall consist of gas/gas exchangers, gas/liquid exchanger and cold separator. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using (ALR) equations for a 2,000 ppmv leak threshold included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). [District Rule 2201] Federally Enforceable Through Title V Permit
6. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 2,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. A gas or liquid leak is a violation of this permit and shall be reported as a deviation. [District Rule 2201] Federally Enforceable Through Title V Permit
7. VOC fugitive emissions shall not exceed 4.22 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. VOC content of gas processed shall not exceed 100% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of two years. [District Rules 2201 and 1070] Federally Enforceable Through Title V Permit
9. VOC content of gas shall be measured using EPA Methods 25, 25a, or 25b referenced as methane. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
11. Only glycol shall be used as the dehydration medium. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Condensate handling shall be conducted in closed systems resulting in fugitive component emissions only. [District Rule 2201] Federally Enforceable Through Title V Permit
13. VOC control efficiency shall be no less than 95% by weight. [District Rule 4408] Federally Enforceable Through Title V Permit
14. Permittee shall maintain daily and monthly records of gas dehydrated and records including those listed in Rule 4408 Section 6.1.2. The permittee shall make such records readily available for District inspection upon request and shall be retained on the premises for a period of not less than five years. [District Rules 2201 and 4408] Federally Enforceable Through Title V Permit
15. Permittee shall maintain records of component leak inspections and repairs in accordance with Rule 4409. [District Rule 4409] Federally Enforceable Through Title V Permit
16. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

DRAFT

ATTACHMENT B

Authorities to Construct
No. S-2234-213-0



AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-213-0

ISSUANCE DATE: 09/14/2010

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

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

SECTION: SE14 **TOWNSHIP:** 30S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

WET GAS COMPRESSOR 14Z STATION INCLUDING THE FOLLOWING PROCESS SYSTEMS INCLUDING A GAS INLET/CHILLER, GLYCOL DEHYDRATION SYSTEM AND JOULE-THOMPSON UNIT

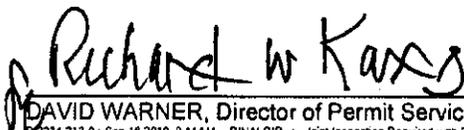
CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. 14Z Station Gas Inlet/Chiller System shall consist of inlet cooler, inlet separator, gas chiller, refrigerant reclaim, refrigerant subcooler, refrigerant economizer, refrigerant suction scrubber, refrigerant accumulator, refrigerant condenser, refrigerant compressors (S-2234-200, -201, -202 and -203), oil separator, pumps and filters, pump down compressor, lube oil storage tank, lube oil pump, emergency vent stacks, propane loading station and drain tank. [District Rule 2201] Federally Enforceable Through Title V Permit
3. 14Z Glycol Dehydration System shall consist of glycol dehydration skid mounted unit with a glycol contactor, a separator coalescer, several glycol heat exchangers, a reboiler/regenerator equipped with 4.7 MMBtu/hr burner, a glycol surge tank, a flash separator, a lean/rich glycol exchanger, and various pumps and filters, with process vent connected to existing vacuum gas gathering system (S-2234-194) and Jatco BTEX System with condenser. [District Rule 2201] Federally Enforceable Through Title V Permit
4. 14Z Joule-Thomson Unit shall consist of gas/gas exchangers, gas/liquid exchanger and cold separator. [District Rule 2201] 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



DAVID WARNER, Director of Permit Services

S-2234-213-0 : Sep 16 2010 9:11AM - RINALDIR : Joint Inspection Required with RINALDIR

5. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using (ALR) equations for a 2,000 ppmv leak threshold included in EPA, "Protocol for Estimating Leak Emissions" (EPA - 453/R-95-017, November 1995). [District Rule 2201] Federally Enforceable Through Title V Permit
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19. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
20. This Authority to Construct (ATC) shall be issued concurrently with ATC S-2234-194-0, '-194-1, '-200-0, '-200-1, '-201-0, '-201-1, '-202-0, '-202-1, '-203-0 and '-203-1. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Prior to operating equipment under this Authority to Construct, the permittee shall surrender VOC emission reduction credits in the following quantities: 1st quarter - 410 lb, 2nd quarter - 410 lb, 3rd quarter - 410 lb, and 4th quarter - 410 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

22. ERC Certificate Number S-2822-1 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, at which time this Authority to Construct shall be administratively reissued, specifying the new offsetting proposal. [District Rule 2201] Federally Enforceable Through Title V Permit

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
S-382-213-0	0	1,540	0	0	0
TOTAL	0	1,540	0	0	0

ATTACHMENT D

Application



OCCIDENTAL OF ELK HILLS, INC.

10800 Stockdale Highway, Bakersfield, CA 93311
Telephone 661 412-5000

July 5, 2011

RECEIVED

JUL - 7 2011

SJVAPCD
Southern Region

CERTIFIED RETURN RECEIPT REQUESTED

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

Subject: Amendments to Occidental of Elk Hills, Inc. Title V Permit (S-2234)

Dear Mr. Scandura:

Occidental of Elk Hills, Inc. requests District approval for a Minor Amendment to include the following Authority to Construct into the facility S-2234 Title-V Permit:

S-2234-213-0

Please bill OEHI for all administrative costs associated with this request. If you have any questions or require addition information concerning this issue, please contact me directly at (661) 412-5214 or on my cellular phone at (661) 331-0118.

Yours sincerely,

Dennis J. Champion, PE
Environmental Engineer

cc: Mike Glavin, OEHI
Kevin Madry, ERM

San Joaquin Valley Air Pollution Control District

www.valleyair.org

RECEIVED
JUL - 7 2011

Permit Application For:

SJVAPCD
Southern Region

[] ADMINISTRATIVE AMENDMENT [] MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">Occidental of Elk Hills, Inc</p>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>10800 Stockdale Hwy</u> CITY: <u>Bakersfield</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93311</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>Elk Hills</u> CITY: <u>Tupman</u> ¼ SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: 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) Incorporate following ATCs into S-2234 Title V document: <p style="text-align: center;">S-2234-213-0</p>	
6. TYPE OR PRINT NAME OF APPLICANT: <p style="text-align: center;">Dennis J. Champion, PE</p>	TITLE OF APPLICANT: <p style="text-align: center;">Sr Environmental Engineer</p>
7. SIGNATURE OF APPLICANT: 	DATE: <u>July 5, 2011</u> PHONE: (661) 412-5214 FAX: (661) 412-5270 EMAIL: <u>dennis_champion@oxy.com</u>

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____ DATE PAID: _____ PROJECT NO: <u>8-1113370</u> FACILITY ID: <u>S-2234</u>
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TV MM

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

RECEIVED
JUL - 7 2011
SJVAPCD
Southern Region

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

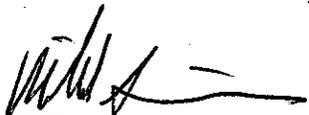
- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE AMENDMENT
 MINOR PERMIT MODIFICATION

COMPANY NAME: Occidental of Elk Hills, Inc	FACILITY ID: S - 2234
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Occidental of Elk Hills, Inc	
3. Agent to the Owner: Occidental of Elk Hills, Inc.	

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

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

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



 Signature of Responsible Official

July 5, 2011

 Date

Mike Glavin

 Name of Responsible Official (please print)

Environmental Team Lead

 Title of Responsible Official (please print)