



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

AUG 28 2012

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

Re: **Proposed Authorities to Construct / Certificate of Conformity (Minor Mod)**
District Facility # S-1372
Project # 1123147

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authorities to Construct for Plains Exploration & Production Company, located at the heavy oil production stationary source in the western Kern County fields, which has been issued a Title V permit. Plains Exploration & Production Company is requesting that a Certificate of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. The project authorizes designation of eight (8) crude oil storage tanks as compliant dormant emissions units (DEUs).

Enclosed is the engineering evaluation of this application, a copy of the current Title V permit, and proposed Authorities to Construct # S-1372-130-6, '-132-4, '-222-3, '-223-3, '-224-3, '-225-3, '-409-1, and '-410-1 with Certificate of Conformity. After demonstrating compliance with the Authorities to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter. 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,



David Warner
Director of Permit Services

Enclosures
cc: Richard Edgehill, Permit Services

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
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San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

AUG 28 2012

Ken Bork
Plains Exploration & Production Company
1200 Discovery Drive, Suite 500
Bakersfield, CA 93309

**Re: Proposed Authorities to Construct / Certificate of Conformity (Minor Mod)
District Facility # S-1372
Project # 1123147**

Dear Mr. Bork:

Enclosed for your review is the District's analysis of your application for Authorities to Construct for the facility identified above. You have requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The project authorizes designation of eight (8) crude oil storage tanks as compliant dormant emissions units (DEUs).

After addressing any EPA comments made during the 45-day comment period, the Authorities to Construct will be issued to the facility with a Certificate of Conformity. Prior to operating with modifications authorized by the Authorities 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.

Thank you for your cooperation in this matter.

Sincerely,



David Warner
Director of Permit Services

Enclosures
cc: Richard Edgehill, Permit Services

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Upon recommencing operation of this unit, tank shall be connected to vapor control system and is subject to normal leak free requirements. [District Rule 2080] Y

S-1372-22 through '-225

While dormant, tank shall be emptied of all fluid and tank may be open. [District Rule 2080] Y

Upon recommencing operation of this unit, tank shall be enclosed with no openings or holes. [District Rule 2080] Y

S-1372-409 and '-410

While dormant, tank shall be emptied of all fluid, tank may be open, and leak-free conditions pertaining to relief valve shall not be required. [District Rule 2080] Y

Upon recommencing operation of this unit, tank shall be enclosed with no holes or openings and shall be subject to normal leak free requirements pertaining to relief valve. [District Rule 2080] Y

Pursuant to District GEAR Policy, this application is administrative and not subject to District Rule 2201, *New and Modified Stationary Source Review Rule*.

PXP received their Title V Operating Permit on June 30, 2002. This modification can be classified as a Title V minor modification pursuant to Rule 2520, Section 3.20, and could be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. PXP must apply to administratively amend their Title V permit.

II. Applicable Rules

Rule 1070 Inspections (12/17/92)

Rule 2010 Permits Required (12/17/92)

Rule 2080 Conditional Approval (12/17/92)

Rule 2520 Federally Mandated Operating Permits (6/21/01)

Rule 4001 New Source Performance Standards (4/14/99) – **not applicable** - no newly constructed or reconstructed units are proposed in this project, nor are the units being modified

Rule 4623 Storage of Organic Liquids (5/19/05)

III. Project Location

The subject tanks are authorized to operate at the following locations within PXP's heavy oil western stationary source:

Permit unit	Location
S-1372-130 and '-132	Section 6, T 30S R22E
S-1372-222, '-223, '-224, and '-225	Section 36, T29S R21E
S-1372-409 and '-410	NE Section 6, T30S R22E

The tanks are 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

The tanks store crude oil prior to custody transfer.

V. Equipment Listing

Pre-Project Equipment Description

S-1372-130-4: 2,000 BBL WATER DISPOSAL TANK (#79) WITH VAPOR RECOVERY SYSTEM SHARED WITH S-1372-128

S-1327-132-3: 5,000 BBL REJECT TANK (#77) SERVED BY VAPOR RECOVERY SYSTEM LISTED ON S-1372-128

S-1372-222-2: 1,000 BBL FIXED ROOF CRUDE OIL STORAGE TANK (#6799)

S-1372-223-2: 2,019 BBL FIXED ROOF CRUDE OIL STORAGE TANK #WP-WT-2 AND THREE FREE WATER KNOCKOUT VESSELS (WELLPORT)

S-1372-224-2: 2,019 BBL FIXED ROOF CRUDE OIL STORAGE TANK (#10635)

S-1372-225-2: 2,019 BBL FIXED ROOF CRUDE OIL STORAGE TANK (#10646)

S-1372-409-0: 1000 BBL FIXED ROOF WASH TANK WITH PV VENT (CYMRIC OIL FIELD)

S-1372-410-0: 200 BBL FIXED ROOF STOCK TANK WITH PV VENT (CYMRIC OIL FIELD)

Proposed Modification

S-1372-130-6, '-132-4, '-222-3, '-224-3, '-225-3, '-409-1, and '-410-1: DESIGNATE AS COMPLIANT DORMANT EMISSIONS UNIT

Post-Project Equipment Description

S-1372-130-6: 2,000 BBL WATER DISPOSAL TANK (#79) WITH VAPOR RECOVERY SYSTEM SHARED WITH S-1372-128

S-1327-132-4: 5,000 BBL REJECT TANK (#77) SERVED BY VAPOR RECOVERY SYSTEM LISTED ON S-1372-128

S-1372-222-3: 1,000 BBL FIXED ROOF CRUDE OIL STORAGE TANK (#6799)

S-1372-223-3: 2,019 BBL FIXED ROOF CRUDE OIL STORAGE TANK #WP-WT-2 AND
THREE FREE WATER KNOCKOUT VESSELS (WELLPORT)

S-1372-224-3: 2,019 BBL FIXED ROOF CRUDE OIL STORAGE TANK (#10635)

S-1372-225-3: 2,019 BBL FIXED ROOF CRUDE OIL STORAGE TANK (#10646)

S-1372-409-1: 1000 BBL FIXED ROOF WASH TANK WITH PV VENT (CYMRIC OIL
FIELD)

S-1372-410-1: 200 BBL FIXED ROOF STOCK TANK WITH PV VENT (CYMRIC OIL
FIELD)

VI. Emission Control Technology Evaluation

There are no proposed changes to the unit or any change in permitted emissions. Therefore there is no need to evaluate the emission control technology.

VII. General Calculations

Since this project is not subject to Rule 2201, calculations are not required. PE2 will be stated (as calculated) for inclusion in the PAS emissions profile.

The Potentials to Emit (PEs) for -1372-222 through '-225 were not previously established and therefore tank emissions were calculated. Standard tank dimensions were assumed with 1 turnover per day, 0.5 psia (permit condition #1), and variable level operation. Additional parameters are included in **Attachment II**.

S-1372-130

VOCs: 0.5 lb/day, 179 lb/yr (PAS Emissions Profile)

S-1372-132

Condition # 18 (current PTO) VOCs: $0.01 \text{ lb/hr} \times 24 \text{ hr/day} = 0.2 \text{ lb/day}$, 87 lb/yr

S-1372-222

VOC: 52 lb/day, 18,973 lb/yr

S-1372-223 through '-225 (each)

VOC: 102.6 lb/day, 37,450 lb/yr

S-1372-409

VOC: 0.2 lb/day, 57 lb/yr (PAS Emissions Profile)

S-1372-410

VOC: 0.1 lb/day, 36 lb/yr (PAS Emissions Profile)

Emissions Profiles are included in **Attachment III**.

VIII. Compliance

While the units are dormant, the tanks are required to be empty. However, they may be open and leak-free P/V valves ('-409 and '-410) and connection to vapor control are not required ('-130 and '-132). Whenever the operator designates the unit as active, the tanks must be closed, P/V valves must operate leak-free ('-409 and '-410), and connection to vapor control is required ('-130, '-132).

Note that nothing in this evaluation shall be construed to shield a unit that has operated out of compliance with any District, state or federal requirements. A unit designated as a DEU is subject to enforcement action for any and all violations.

If the unit becomes out of compliance with any District Rules while Dormant, the operator must apply for and receive a valid ATC to bring the unit back into compliance with all District Regulations prior to recommencing operation.

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 4623, Storage of Organic Liquids

This rule applies to any tank with a capacity of 1,100 gallons or greater in which any organic liquid is placed, held, or stored. The tanks are not required to be in compliance with the rule while dormant.

IX. 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 San Joaquin Valley Unified Air Pollution Control District (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.
- 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.

Consistent with CEQA and CEQA Guidelines requirements, the District has adopted procedures and guidelines for implementing CEQA. The District's ERG establishes procedures for avoiding unnecessary delay during the District's permitting process while ensuring that significant environmental impacts are thoroughly and consistently addressed. The ERG includes policies and procedures to be followed when processing permits for projects that are exempt under CEQA.

The State Legislature granted a number of exemptions from CEQA, including projects that require only ministerial approval. Based upon analysis of its own laws and consideration of CEQA provisions, the District has identified a limited number of District permitting activities considered to be ministerial approvals. As set forth in §4.2.1 of the ERG, projects permitted consistent with the District's *Guidelines for Expedited Application Review* (GEAR) are standard application reviews in which little or no discretion is used in issuing ATC documents.

For the proposed project, the District performed an Engineering Evaluation (this document) and determined that the project qualifies for processing under the procedures set forth in the District's *Guidelines for Expedited Application Review* (GEAR). Thus, as discussed above, this issuance of such ATC(s) is a ministerial approval for the District and is not subject to CEQA provisions.

X. Recommendation

Issue ATCs S-1372-130-6, '-132-4, '-222-3, '-223-3, '-224-3, '-225-3, '-409-1, and '-410-1 subject to the permit conditions listed on the attached draft ATC included in **Attachment II**.

XI. Billing Information

Permit Unit	Fee Schedule	Equipment rating	Annual Fee
S-1372-130	3020-05-D	84,000 gallon	\$ 185.00
S-1372-132	3020-05-E	210,000 gallon	\$ 246.00
S-1372-222	3020-05-C	42,000 gallon	\$ 135.00
S-1372-223	3020-05-D	84,780 gallon	\$ 185.00
S-1372-224	3020-05-D	84,780 gallon	\$ 185.00
S-1372-225	3020-05-D	84,780 gallon	\$ 185.00
S-1372-409	3020-05-C	42,000 gallon	\$ 135.00
S-1372-410	3020-05-B	8400 gallon	\$ 93.00

Attachments

- I: Current PTOs
- II Tank Calculation
- III. Emissions Profiles
- IV: Draft ATCs

Attachment I
Current PTOs

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1372-130-4

EXPIRATION DATE: 05/31/2016

SECTION: 06 **TOWNSHIP:** 30S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

2,000 BBL WATER DISPOSAL TANK (#79) WITH VAPOR RECOVERY SYSTEM SHARED WITH S-1372-128

PERMIT UNIT REQUIREMENTS

1. Pressure/vacuum relief valves shall be set to open at 2 oz./square inch pressure and 0.5 oz./square inch vacuum. [District Rule 2201] Federally Enforceable Through Title V Permit
2. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The API gravity of an organic liquid stored in this tank shall be less than 26 degrees. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Vapor compressor shall activate whenever tank internal pressure exceeds 2 oz./square inch. [District Rule 2201] Federally Enforceable Through Title V Permit
5. There shall be no truck loading or unloading at this facility. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Facility piping system shall be routinely inspected for leaks and all leaks shall be promptly repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Vapor collection system shall not discharge to atmosphere except during breakdown conditions pursuant to Rule 1100. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Liquids from gas/liquid separators shall be pumped back to tanks. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Vapor control system efficiency shall be maintained at no less than 99% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The total VOC emissions from the controlled vapor displacement and components connecting vapor control piping between the tank and the main vapor control trunk line shall be less than 0.5 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. This tank shall be fully enclosed and shall be maintained in a leak-free condition. [District Rule 4623, 5.1.3] Federally Enforceable Through Title V Permit
12. Leak-free is a condition without a gas leak or a liquid leak. [District Rule 4623, 3.17] Federally Enforceable Through Title V Permit
13. A Gas Leak is indicated by a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with the test method in Section 6.4.8. [District Rule 4623, 3.11] Federally Enforceable Through Title V Permit
14. A liquid leak is the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 4623, 3.18] 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.

15. The pressure-vacuum relief valve shall be set to within ten (10) percent of the maximum allowable working pressure of the tank. The pressure-vacuum relief valve shall be permanently labeled with the operating pressure settings. The pressure-vacuum relief valve shall be properly installed and maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve set pressure. [District Rule 4623, 5.2] Federally Enforceable Through Title V Permit
16. This tank shall be connected to an APCO-approved vapor recovery system that consists of a closed system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be maintained in a leak-free condition. The VOC control device shall reduce the inlet VOC emissions by at least 95 percent by weight as determined by the test method specified in Section 6.4.6. [District Rule 4623, 5.6.1] Federally Enforceable Through Title V Permit
17. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623, 5.6.2] Federally Enforceable Through Title V Permit
18. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623, 5.6.3] Federally Enforceable Through Title V Permit
19. Only operators who elect to participate in the voluntary tank preventive inspection and maintenance, and tank interior cleaning program (program) shall be allowed to use the provisions specified in Tables 3 to 5 and Section 5.7.5. When using Tables 3 to 5 and Section 5.7.5 provisions, operators shall perform the procedures as expeditiously as practicable and minimize emissions to the maximum extent practicable. To participate in this program, the operator shall comply with the requirements of Sections 5.7.1 through 5.7.4. [District Rule 4623, 5.7] Federally Enforceable Through Title V Permit
20. Hatch, tank seals and seams, cable seals, piping components directly affixed to the tank and within five feet of the tank, including but not limited to valves, flanges, connectors etc shall be inspected annually by the facility operator using portable hydrocarbon detection instrument in accordance with EPA Method 21, visually, or ultrasonically (as appropriate) to ensure the structural integrity of the tank. [District Rules 2201, 4623 (Table 3)] Federally Enforceable Through Title V Permit
21. For leaking components, the operator shall immediately affix a tag and maintain records of liquid leak and gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201, 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
22. Upon detection of any gas-leak, the operator shall: (a) Eliminate the leak within 8 hours after detection. (b) If the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices; and eliminate the leak within 48 hours after detection, and (c) In no event that the total time to minimize and eliminate the leak shall exceed 56 hours after detection. [District Rules 2201, 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
23. Leaking tank components that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines shall not constitute a violation of the District Rule 4623. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of the District Rule 4623. [District Rules 2201, 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
24. If a component type for a given tank is found to leak during an annual inspection, then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, then revert to annual inspections. [District Rules 2201, 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
25. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201, 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

26. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
27. For crude oil with an API gravity of 26 degrees or less, TVP shall be measured using the latest version of the Lawrence Berkeley National Laboratory "Test Method for Vapor Pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph". Should the permittee choose to use different test methodology, the methodology shall be approved by the District, the ARB, and the EPA prior to its use. [District Rules 2201, 4623, 6.4] Federally Enforceable Through Title V Permit
28. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287-92(2000) el "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057-95 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products". Should the permittee choose to use different test methodology, the methodology shall be approved by the District, the ARB, and the EPA prior to its use. [District Rules 2201, 4623, 6.4] Federally Enforceable Through Title V Permit
29. The efficiency of any VOC destruction device shall be measured using EPA Method 18, 25, 25A, or 25B (as appropriate). [District Rule 4623, 6.4.6] Federally Enforceable Through Title V Permit
30. The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
31. The operator of a fixed roof tank shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
32. Operator shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
33. Operator shall conduct a TVP and API testing at least once every 24 months during summer (July - September) and/or whenever there is a change in the source or type of organic liquid stored in the tank. Operator shall submit records of TVP and API gravity testing within 45 days of performing the test. These records shall include the tank identification number, PTO number, type of stored organic liquid, TVP and API gravity of the stored organic liquid, test methods used, and a copy of the test results. [District Rules 2201, 2520, 9.3.2.] Federally Enforceable Through Title V Permit
34. The permittee shall maintain records sufficient to demonstrate compliance with the daily emission limit. These records shall contain calculated emission quantity as well as each process variable used in the respective calculations. All records shall be retained on site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 2201, 2520, 9.3.2] Federally Enforceable Through Title V Permit
35. As used in this permit, the term "source or type of petroleum" shall mean petroleum liquids with similar characteristics. The operator shall maintain records of the API gravity of petroleum liquids stored in this unit to determine which oils are from a common source. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
36. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Tank emissions are fugitive emissions not considered to come from a point source. Therefore, the requirements of Rule 4801 (Amended 12/17/92) and 40 CFR Part 60 Subparts K, Ka, and Kb do not apply to this 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-1372-132-3

EXPIRATION DATE: 05/31/2016

SECTION: 06 **TOWNSHIP:** 30S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

5,000 BBL REJECT TANK (#77) SERVED BY VAPOR RECOVERY SYSTEM LISTED ON S-1372-128

PERMIT UNIT REQUIREMENTS

1. Pressure/vacuum relief valves shall be set to open at 2 oz./square inch pressure and 0.5 oz./square inch vacuum. [District Rule 4623] Federally Enforceable Through Title V Permit
2. Vapor compressor shall activate whenever tank internal pressure exceeds 2 oz./square inch. [District NSR Rule] Federally Enforceable Through Title V Permit
3. True vapor pressure (TVP) of any liquid placed, stored or held in the tank shall not exceed 1.60 psia. [District NSR Rule] Federally Enforceable Through Title V Permit
4. There shall be no truck loading or unloading at this facility. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Facility piping system shall be routinely inspected for leaks and all leaks shall be promptly repaired. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Vapor control system efficiency shall be maintained at no less than 99% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Vapor collection system shall not discharge to atmosphere except during breakdown conditions pursuant to Rule 1100. [District Rule 1100] Federally Enforceable Through Title V Permit
8. Liquids from gas/liquid separators shall be pumped back to tanks. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Throughput shall not exceed 100 bbl per day. [District NSR Rule] Federally Enforceable Through Title V Permit
10. VOC emission rate shall not exceed 0.01 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
11. This tank shall be fully enclosed and shall be maintained in a leak-free condition. [District Rule 4623, 5.1.3] Federally Enforceable Through Title V Permit
12. Leak-free is a condition without a gas leak or a liquid leak. [District Rule 4623, 3.17] Federally Enforceable Through Title V Permit
13. A Gas Leak is indicated by a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with the test method in Section 6.4.8. [District Rule 4623, 3.11] Federally Enforceable Through Title V Permit
14. A liquid leak is the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 4623, 3.18] 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.

15. The pressure-vacuum relief valve shall be set to within ten (10) percent of the maximum allowable working pressure of the tank. The pressure-vacuum relief valve shall be permanently labeled with the operating pressure settings. The pressure-vacuum relief valve shall be properly installed and maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve set pressure. [District Rule 4623, 5.2] Federally Enforceable Through Title V Permit
16. This tank shall be connected to an APCO-approved vapor recovery system that consists of a closed system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be maintained in a leak-free condition. The VOC control device shall reduce the inlet VOC emissions by at least 95 percent by weight as determined by the test method specified in Section 6.4.6. [District Rule 4623, 5.6.1] Federally Enforceable Through Title V Permit
17. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623, 5.6.2] Federally Enforceable Through Title V Permit
18. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623, 5.6.3] Federally Enforceable Through Title V Permit
19. Only operators who elect to participate in the voluntary tank preventive inspection and maintenance, and tank interior cleaning program (program) shall be allowed to use the provisions specified in Tables 3 to 5 and Section 5.7.5. When using Tables 3 to 5 and Section 5.7.5 provisions, operators shall perform the procedures as expeditiously as practicable and minimize emissions to the maximum extent practicable. To participate in this program, the operator shall comply with the requirements of Sections 5.7.1 through 5.7.4. [District Rule 4623, 5.7] Federally Enforceable Through Title V Permit
20. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
21. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
22. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) Eliminate or minimize the leak within 8 hours after detection. (b) If the leak can not be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices; and eliminate the leak within 48 hours after detection. (c) In no event that the total time to minimize and eliminate the leak shall exceed 56 hours after detection. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
23. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of the District Rule 4623. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of the District Rule 4623. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
24. If a component type for a given tank is found to leak during an annual inspection, then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, then revert to annual inspections. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
25. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

26. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
27. Operator shall maintain monthly records of daily average throughput. [District Rule 2520] Federally Enforceable Through Title V Permit
28. Operator shall maintain all records for at least five years and conform to the recordkeeping requirements described in District Rule 2520. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit
29. Operator shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
30. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Tank emissions are fugitive emissions not considered to come from a point source. Therefore, the requirements of Rule 4801 (Amended 12/17/92) and 40 CFR Part 60 Subparts K, Ka, and Kb do not apply to this 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-1372-222-2

EXPIRATION DATE: 05/31/2016

SECTION: 36 **TOWNSHIP:** 29S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

1,000 BBL FIXED ROOF CRUDE OIL STORAGE TANK (#6799)

PERMIT UNIT REQUIREMENTS

1. True vapor pressure of any organic liquid introduced to the tank shall not exceed 0.5 psia at liquid temperature. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
2. This tank shall be equipped with a pressure-vacuum (PV) relief valve set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve's set pressure. [District Rule 4623, 5.2] Federally Enforceable Through Title V Permit
3. The operator shall conduct a TVP testing of each uncontrolled fixed roof tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in each tank. In lieu of testing each uncontrolled fixed roof tank, an operator may conduct a TVP testing of a representative tank provided the requirements of Sections 6.2.1.1.1 through 6.2.1.1.5 are met. The operator shall also comply with Section 6.2.1.2. The operator shall submit the records of TVP and/or API gravity testing to the APCO as specified in Section 6.3.6. [District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
4. The operator shall submit the records of TVP and API gravity testing conducted in accordance with the requirements of Section 6.2 to the APCO within 45 days after the date of testing. The record shall include the tank identification number, PTO number, type of stored organic liquid, TVP and API gravity of the stored organic liquid, test methods used, and a copy of the test results. [District Rule 4623, 6.3.6] Federally Enforceable Through Title V Permit
5. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623, 6.4.4] Federally Enforceable Through Title V Permit
6. The operator shall keep an accurate record of each organic liquid stored in each tank, including its storage temperature, TVP, and API gravity. Such records shall be retained for at least five years and made available to the District upon request. [District Rule 4623, 6.3.1] 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-1372-223-2

EXPIRATION DATE: 05/31/2016

SECTION: 36 **TOWNSHIP:** 29S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

2,019 BBL FIXED ROOF CRUDE OIL STORAGE TANK #WP-WT-2 AND THREE FREE WATER KNOCKOUT VESSELS (WELLPORT)

PERMIT UNIT REQUIREMENTS

1. True vapor pressure of any organic liquid introduced to the tank shall not exceed 0.5 psia at liquid temperature. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
2. This tank shall be equipped with a pressure-vacuum (PV) relief valve set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve's set pressure. [District Rule 4623, 5.2] Federally Enforceable Through Title V Permit
3. The operator shall conduct a TVP testing of each uncontrolled fixed roof tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in each tank. In lieu of testing each uncontrolled fixed roof tank, an operator may conduct a TVP testing of a representative tank provided the requirements of Sections 6.2.1.1.1 through 6.2.1.1.5 are met. The operator shall also comply with Section 6.2.1.2. The operator shall submit the records of TVP and/or API gravity testing to the APCO as specified in Section 6.3.6. [District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
4. The operator shall submit the records of TVP and API gravity testing conducted in accordance with the requirements of Section 6.2 to the APCO within 45 days after the date of testing. The record shall include the tank identification number, PTO number, type of stored organic liquid, TVP and API gravity of the stored organic liquid, test methods used, and a copy of the test results. [District Rule 4623, 6.3.6] Federally Enforceable Through Title V Permit
5. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623, 6.4.4] Federally Enforceable Through Title V Permit
6. The operator shall keep an accurate record of each organic liquid stored in each tank, including its storage temperature, TVP, and API gravity. Such records shall be retained for at least five years and made available to the District upon request. [District Rule 4623, 6.3.1] 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-1372-224-2

EXPIRATION DATE: 05/31/2016

SECTION: 36 **TOWNSHIP:** 29S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

2,019 BBL FIXED ROOF CRUDE OIL STORAGE TANK (#10635)

PERMIT UNIT REQUIREMENTS

1. True vapor pressure of any organic liquid introduced to the tank shall not exceed 0.5 psia at liquid temperature. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
2. This tank shall be equipped with a pressure-vacuum (PV) relief valve set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve's set pressure. [District Rule 4623, 5.2] Federally Enforceable Through Title V Permit
3. The operator shall conduct a TVP testing of each uncontrolled fixed roof tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in each tank. In lieu of testing each uncontrolled fixed roof tank, an operator may conduct a TVP testing of a representative tank provided the requirements of Sections 6.2.1.1.1 through 6.2.1.1.5 are met. The operator shall also comply with Section 6.2.1.2. The operator shall submit the records of TVP and/or API gravity testing to the APCO as specified in Section 6.3.6. [District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
4. The operator shall submit the records of TVP and API gravity testing conducted in accordance with the requirements of Section 6.2 to the APCO within 45 days after the date of testing. The record shall include the tank identification number, PTO number, type of stored organic liquid, TVP and API gravity of the stored organic liquid, test methods used, and a copy of the test results. [District Rule 4623, 6.3.6] Federally Enforceable Through Title V Permit
5. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623, 6.4.4] Federally Enforceable Through Title V Permit
6. The operator shall keep an accurate record of each organic liquid stored in each tank, including its storage temperature, TVP, and API gravity. Such records shall be retained for at least five years and made available to the District upon request. [District Rule 4623, 6.3.1] 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-1372-225-2

EXPIRATION DATE: 05/31/2016

SECTION: 36 **TOWNSHIP:** 29S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

2,019 BBL FIXED ROOF CRUDE OIL STORAGE TANK (#10646)

PERMIT UNIT REQUIREMENTS

1. True vapor pressure of any organic liquid introduced to the tank shall not exceed 0.5 psia at liquid temperature. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
2. This tank shall be equipped with a pressure-vacuum (PV) relief valve set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve's set pressure. [District Rule 4623, 5.2] Federally Enforceable Through Title V Permit
3. The operator shall conduct a TVP testing of each uncontrolled fixed roof tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in each tank. In lieu of testing each uncontrolled fixed roof tank, an operator may conduct a TVP testing of a representative tank provided the requirements of Sections 6.2.1.1.1 through 6.2.1.1.5 are met. The operator shall also comply with Section 6.2.1.2. The operator shall submit the records of TVP and/or API gravity testing to the APCO as specified in Section 6.3.6. [District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
4. The operator shall submit the records of TVP and API gravity testing conducted in accordance with the requirements of Section 6.2 to the APCO within 45 days after the date of testing. The record shall include the tank identification number, PTO number, type of stored organic liquid, TVP and API gravity of the stored organic liquid, test methods used, and a copy of the test results. [District Rule 4623, 6.3.6] Federally Enforceable Through Title V Permit
5. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623, 6.4.4] Federally Enforceable Through Title V Permit
6. The operator shall keep an accurate record of each organic liquid stored in each tank, including its storage temperature, TVP, and API gravity. Such records shall be retained for at least five years and made available to the District upon request. [District Rule 4623, 6.3.1] 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-1372-409-0

EXPIRATION DATE: 05/31/2016

SECTION: NE06 **TOWNSHIP:** 30S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

1000 BBL FIXED ROOF WASH TANK WITH PV VENT (CYMRIC OIL FIELD)

PERMIT UNIT REQUIREMENTS

1. The tank shall be equipped with a fixed roof with no holes or openings. [District Rule 4623]
2. Tank shall be operated at a constant level. [District Rule 2201]
3. True vapor pressure of any liquid placed or stored in this tank shall not exceed 0.1 psia. [District Rules 2201 and 4623]
4. Daily average tank crude oil throughput shall not exceed 20 barrels per day. [District Rules 2201 and 4623]
5. This tank shall be equipped with a pressure-vacuum (PV) relief valve set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in gas-tight condition except when the operating pressure exceeds the valve's set pressure. [District Rule 4623]
6. Permittee shall conduct True Vapor Pressure (TVP) and API gravity testing of the crude oil stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank. [District Rule 4623, 6.2.2]
7. In lieu of testing each uncontrolled fixed roof tank, the permittee may conduct a TVP testing of the organic liquid stored in a representative tank provided the requirements of Sections 6.2.1.1.1 through 6.2.1.1.5 are met. [District Rule 4623, 6.2.1]
8. True vapor pressure shall be measured using Reid vapor pressure ASTM Method D323-94, and converting the RVP to TVP at the tank's maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance of the oil and gas section of "California Air Resources Boards (ARB) Technical Guidance Document to the Criteria and Guidelines Regulations for AB 2588", dated August 1989. As an alternative to using ASTM D 323-94, the TVP of crude oil with an API gravity range of greater than 20 degrees up to 30 degrees may be determined by using other equivalent test methods approved by APCO, ARB and EPA. [District Rule 4623, 6.4.3]
9. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287-92 (2000) e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057-95 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623, 6.4.2]
10. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623, 6.3.6]
11. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623, 6.3.1]
12. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623, 6.3]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1372-410-0

EXPIRATION DATE: 05/31/2016

SECTION: NE06 **TOWNSHIP:** 30S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

200 BBL FIXED ROOF STOCK TANK WITH PV VENT (CYMRIC OIL FIELD)

PERMIT UNIT REQUIREMENTS

1. The tank shall be equipped with a fixed roof with no holes or openings. [District Rule 4623]
2. Tank shall be operated at a constant level. [District Rule 2201]
3. True vapor pressure of any liquid placed or stored in this tank shall not exceed 0.1 psia. [District Rules 2201 and 4623]
4. Daily average tank crude oil throughput shall not exceed 20 barrels per day. [District Rules 2201 and 4623]
5. This tank shall be equipped with a pressure-vacuum (PV) relief valve set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in gas-tight condition except when the operating pressure exceeds the valve's set pressure. [District Rule 4623]
6. Permittee shall conduct True Vapor Pressure (TVP) and API gravity testing of the crude oil stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank. [District Rule 4623, 6.2.2]
7. In lieu of testing each uncontrolled fixed roof tank, the permittee may conduct a TVP testing of the organic liquid stored in a representative tank provided the requirements of Sections 6.2.1.1.1 through 6.2.1.1.5 are met. [District Rule 4623, 6.2.1]
8. True vapor pressure shall be measured using Reid vapor pressure ASTM Method D323-94, and converting the RVP to TVP at the tank's maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance of the oil and gas section of "California Air Resources Boards (ARB) Technical Guidance Document to the Criteria and Guidelines Regulations for AB 2588", dated August 1989. As an alternative to using ASTM D 323-94, the TVP of crude oil with an API gravity range of greater than 20 degrees up to 30 degrees may be determined by using other equivalent test methods approved by APCO, ARB and EPA. [District Rule 4623, 6.4.3]
9. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287-92 (2000) e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057-95 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623, 6.4.2]
10. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623, 6.3.6]
11. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623, 6.3.1]
12. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623, 6.3]

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

Attachment II

Tank Calculations

1000 bbl

Tank Input Data	
permit number (S-xxxx-xx-xx)	-223
facility tank I.D.	--
nearest city {1: Bakersfield, 2: Fresno, 3: Stockton}	1
tank ROC vapor pressure (psia)	0.5
liquid bulk storage temperature, Tb (°F)	100
is this a constant-level tank? {yes, no}	no
will flashing losses occur in this tank (only if first-line tank)? {yes, no}	no
breather vent pressure setting range (psi)	0.06
diameter of tank (feet)	21.6
capacity of tank (bbl)	1,000
conical or dome roof? {c, d}	c
shell height of tank (feet)	16
average liquid height (feet)	10
are the roof and shell the same color? {yes,no}	yes
For roof:	
color {1:Spec Al, 2:Diff Al, 3:Light, 4:Med, 5:Red, 6:White}	4
condition {1: Good, 2: Poor}	1
-----This row only used if shell is different color from roof-----	3
-----This row only used if shell is different color from roof-----	1

Liquid Input Data	A	B
maximum daily fluid throughput (bbl)		1,000
maximum annual fluid throughput (bbl)	365,000	365,000
-----This row only used if flashing losses occur in this tank-----		100
-----This row only used if flashing losses occur in this tank-----		36,500
molecular weight, Mw (lb/lb-mol)		100

Calculated Values	A	B
daily maximum ambient temperature, T _{ax} (°F)		77.65
daily minimum ambient temperature, T _{an} (°F)		53.15
daily total solar insulation factor, I (Btu/ft ² -day)		1648.9
atmospheric pressure, P _a (psia)		14.47
water vapor pressure at daily maximum liquid surface temperature (T _{lx}), P _{vx} (psia)	99.0	0.9259
water vapor pressure at daily minimum liquid surface temperature (T _{ln}), P _{vn} (psia)	88.2	0.6653
water vapor pressure at average liquid surface temperature (T _{la}), P _{va} (psia)	93.6	0.7903
roof outage, H _{ro} (feet)		0.2250
vapor space volume, V _v (cubic feet)		2281.06
paint factor, alpha		0.68
vapor density, W _v (lb/cubic foot)		0.0084
daily vapor temperature range, delta T _v (degrees Rankine)		49.04
vapor space expansion factor, K _e		0.1032

Results	lb/year	lb/day
Standing Storage Loss	723	1.98
Working Loss	18,250	50.00
Flashing Loss	N/A	N/A
Total Uncontrolled Tank VOC Emissions	18,973	52.0

Summary Table	
Permit Number	-223
Facility Tank I.D.	--
Tank capacity (bbl)	2,000
Tank diameter (ft)	21.6
Tank shell height (ft)	16
Conical or Dome Roof	Conical
Maximum Daily Fluid Throughput (bbl/day)	1,000
Maximum Annual Fluid Throughput (bbl/year)	365,000
Maximum Daily Oil Throughput (bbl/day)	N/A
Maximum Annual Oil Throughput (bbl/year)	N/A
Total Uncontrolled Daily Tank VOC Emissions (lb/day)	52.0
Total Uncontrolled Annual Tank VOC Emissions (lb/year)	18,973

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Tank Input Data	
permit number (S-xxxx-xx-xx)	-223
facility tank I.D.	--
nearest city {1: Bakersfield, 2: Fresno, 3: Stockton}	1
tank ROC vapor pressure (psia)	0.5
liquid bulk storage temperature, Tb (°F)	100
is this a constant-level tank? {yes, no}	no
will flashing losses occur in this tank (only if first-line tank)? {yes, no}	no
breather vent pressure setting range (psi)	0.06
diameter of tank (feet)	29.75
capacity of tank (bbl)	2,000
conical or dome roof? {c, d}	c
shell height of tank (feet)	16
average liquid height (feet)	12
are the roof and shell the same color? {yes,no}	yes
For roof:	
color {1:Spec Al, 2:Diff Al, 3:Light, 4:Med, 5:Red, 6:White}	4
condition {1: Good, 2: Poor}	1
-----This row only used if shell is different color from roof-----	3
-----This row only used if shell is different color from roof-----	1

Liquid Input Data	A	B
maximum daily fluid throughput (bbl)		2,000
maximum annual fluid throughput (bbl)	730,000	730,000
-----This row only used if flashing losses occur in this tank-----		100
-----This row only used if flashing losses occur in this tank-----		36,500
molecular weight, Mw (lb/lb-mol)		100

Calculated Values	A	B
daily maximum ambient temperature, T _{ax} (°F)		77.65
daily minimum ambient temperature, T _{an} (°F)		53.15
daily total solar insolation factor, I (Btu/ft ² -day)		1648.9
atmospheric pressure, P _a (psia)		14.47
water vapor pressure at daily maximum liquid surface temperature (T _{lx}), P _{vx} (psia)	99.0	0.9259
water vapor pressure at daily minimum liquid surface temperature (T _{ln}), P _{vn} (psia)	88.2	0.6653
water vapor pressure at average liquid surface temperature (T _{la}), P _{va} (psia)	93.6	0.7903
roof outage, H _{ro} (feet)		0.3099
vapor space volume, V _v (cubic feet)		2995.92
paint factor, alpha		0.68
vapor density, W _v (lb/cubic foot)		0.0084
daily vapor temperature range, delta T _v (degrees Rankine)		49.04
vapor space expansion factor, K _e		0.1032

Results	lb/year	lb/day
Standing Storage Loss	950	2.60
Working Loss	36,500	100.00
Flashing Loss	N/A	N/A
Total Uncontrolled Tank VOC Emissions	37,450	102.6

Summary Table	
Permit Number	-223
Facility Tank I.D.	--
Tank capacity (bbl)	2,000
Tank diameter (ft)	29.75
Tank shell height (ft)	16
Conical or Dome Roof	Conical
Maximum Daily Fluid Throughput (bbl/day)	2,000
Maximum Annual Fluid Throughput (bbl/year)	730,000
Maximum Daily Oil Throughput (bbl/day)	N/A
Maximum Annual Oil Throughput (bbl/year)	N/A
Total Uncontrolled Daily Tank VOC Emissions (lb/day)	102.6
Total Uncontrolled Annual Tank VOC Emissions (lb/year)	37,450

Attachment III
Emissions Profiles

Permit #: S-1372-130-6	Last Updated
Facility: PLAINS EXPLORATION &	08/18/2012 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	179.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.5
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-1372-132-4	Last Updated
Facility: PLAINS EXPLORATION &	08/18/2012 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	87.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S 1372-222 -3

Issued: / /
Implemented: / /

Last Updated:
08/20/12 EDGEHILR

Facility: PLAINS EXPLORATION & PRODUCTION CO

Use PTO
emissions

Equipment
Prebaselined: Yes
 No

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0	0	0	0	19973
Daily Emis. Limit (lb/Day):	0.0	0.0	0.0	0.0	52.0
Quarterly Net Emissions Change (lb/Qtr)					
1:	0	0	0	0	0
2:	0	0	0	0	0
3:	0	0	0	0	0
4:	0	0	0	0	0
Check if offsets are triggered but exemption applies	<input type="checkbox"/>				
Offset Ratio:					
Quarterly Offset Amounts (lb/Qtr)					
1:					
2:					
3:					
4:					
SLC ID (PTE):					
SLC ID (DEL):					

Facility SLC

Exit

Permit #: S-1372-223-3	Last Updated
Facility: PLAINS EXPLORATION &	08/18/2012 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	37450.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	102.6
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-1372-222-3	Last Updated
Facility: PLAINS EXPLORATION &	08/18/2012 EDGEHILR

Equipment Pre-Baselined: NO

773

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	19987.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	52.0
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-1372-224-3	Last Updated
Facility: PLAINS EXPLORATION &	08/18/2012 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	37450.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	102.6
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-1372-225-3	Last Updated
Facility: PLAINS EXPLORATION &	08/18/2012 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	37450.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	102.6
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-1372-409-1	Last Updated
Facility: PLAINS EXPLORATION &	08/18/2012 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	57.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-1372-410-1	Last Updated
Facility: PLAINS EXPLORATION &	08/18/2012 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	36.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.1
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Attachment IV
Draft ATCs

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1372-130-6

LEGAL OWNER OR OPERATOR: PLAINS EXPLORATION & PRODUCTION COMPANY
MAILING ADDRESS: ATTN: KENNETH BORK
1200 DISCOVERY DRIVE, SUITE 500
BAKERSFIELD, CA 93309

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
CA

SECTION: 06 **TOWNSHIP:** 30S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 2,000 BBL WATER DISPOSAL TANK (#79) WITH VAPOR RECOVERY SYSTEM SHARED WITH S-1372-128: DESIGNATE AS COMPLIANT DORMANT EMISSIONS UNIT

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. No modification to this unit shall be performed without an Authority to Construct for such modifications, except for changes specified in the conditions below. [District Rule 2010] Federally Enforceable Through Title V Permit
4. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
5. While dormant, tank shall be emptied of all fluid, tank may be disconnected from vapor control system and may be open. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Upon recommencing operation of this unit, tank shall be connected to vapor control system and is subject to normal leak free requirements. [District Rule 2080] 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

DRAFT

DAVID WARNER, Director of Permit Services

S-1372-130-6 : Aug 18 2012 2:39PM -- EDGEHILR : Joint Inspection NOT Required

7. {4565} Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070]
8. If this unit has become dormant because it does not comply with District Rules, or if the unit becomes out of compliance with District Rules while it is dormant, operation of the unit is not authorized until an Authority to Construct permit is issued approving all necessary retrofits and permit changes required to comply with the respective District Rules. [District Rule 2080] Federally Enforceable Through Title V Permit
9. Pressure/vacuum relief valves shall be set to open at 2 oz./square inch pressure and 0.5 oz./square inch vacuum. [District Rule 2201] Federally Enforceable Through Title V Permit
10. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The API gravity of an organic liquid stored in this tank shall be less than 26 degrees. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Vapor compressor shall activate whenever tank internal pressure exceeds 2 oz./square inch. [District Rule 2201] Federally Enforceable Through Title V Permit
13. There shall be no truck loading or unloading at this facility. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Facility piping system shall be routinely inspected for leaks and all leaks shall be promptly repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Vapor collection system shall not discharge to atmosphere except during breakdown conditions pursuant to Rule 1100. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Liquids from gas/liquid separators shall be pumped back to tanks. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Vapor control system efficiency shall be maintained at no less than 99% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The total VOC emissions from the controlled vapor displacement and components connecting vapor control piping between the tank and the main vapor control trunk line shall be less than 0.5 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. This tank shall be fully enclosed and shall be maintained in a leak-free condition. [District Rule 4623, 5.1.3] Federally Enforceable Through Title V Permit
20. Leak-free is a condition without a gas leak or a liquid leak. [District Rule 4623, 3.17] Federally Enforceable Through Title V Permit
21. A Gas Leak is indicated by a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with the test method in Section 6.4.8. [District Rule 4623, 3.11] Federally Enforceable Through Title V Permit
22. A liquid leak is the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 4623, 3.18] Federally Enforceable Through Title V Permit
23. The pressure-vacuum relief valve shall be set to within ten (10) percent of the maximum allowable working pressure of the tank. The pressure-vacuum relief valve shall be permanently labeled with the operating pressure settings. The pressure-vacuum relief valve shall be properly installed and maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve set pressure. [District Rule 4623, 5.2] Federally Enforceable Through Title V Permit
24. This tank shall be connected to an APCO-approved vapor recovery system that consists of a closed system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be maintained in a leak-free condition. The VOC control device shall reduce the inlet VOC emissions by at least 95 percent by weight as determined by the test method specified in Section 6.4.6. [District Rule 4623, 5.6.1] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

25. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623, 5.6.2] Federally Enforceable Through Title V Permit
26. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623, 5.6.3] Federally Enforceable Through Title V Permit
27. Only operators who elect to participate in the voluntary tank preventive inspection and maintenance, and tank interior cleaning program (program) shall be allowed to use the provisions specified in Tables 3 to 5 and Section 5.7.5. When using Tables 3 to 5 and Section 5.7.5 provisions, operators shall perform the procedures as expeditiously as practicable and minimize emissions to the maximum extent practicable. To participate in this program, the operator shall comply with the requirements of Sections 5.7.1 through 5.7.4. [District Rule 4623, 5.7] Federally Enforceable Through Title V Permit
28. Hatch, tank seals and seams, cable seals, piping components directly affixed to the tank and within five feet of the tank, including but not limited to valves, flanges, connectors etc shall be inspected annually by the facility operator using portable hydrocarbon detection instrument in accordance with EPA Method 21, visually, or ultrasonically (as appropriate) to ensure the structural integrity of the tank. [District Rules 2201, 4623 (Table 3)] Federally Enforceable Through Title V Permit
29. For leaking components, the operator shall immediately affix a tag and maintain records of liquid leak and gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201, 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
30. Upon detection of any gas-leak, the operator shall: (a) Eliminate the leak within 8 hours after detection. (b) If the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices; and eliminate the leak within 48 hours after detection, and (c) In no event that the total time to minimize and eliminate the leak shall exceed 56 hours after detection. [District Rules 2201, 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
31. Leaking tank components that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines shall not constitute a violation of the District Rule 4623. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of the District Rule 4623. [District Rules 2201, 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
32. If a component type for a given tank is found to leak during an annual inspection, then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, then revert to annual inspections. [District Rules 2201, 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
33. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201, 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
34. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
35. For crude oil with an API gravity of 26 degrees or less, TVP shall be measured using the latest version of the Lawrence Berkeley National Laboratory "Test Method for Vapor Pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph". Should the permittee choose to use different test methodology, the methodology shall be approved by the District, the ARB, and the EPA prior to its use. [District Rules 2201, 4623, 6.4] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

36. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287-92(2000) el "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057-95 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products". Should the permittee choose to use different test methodology, the methodology shall be approved by the District, the ARB, and the EPA prior to its use. [District Rules 2201, 4623, 6.4] Federally Enforceable Through Title V Permit
37. The efficiency of any VOC destruction device shall be measured using EPA Method 18, 25, 25A, or 25B (as appropriate). [District Rule 4623, 6.4.6] Federally Enforceable Through Title V Permit
38. {981} The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
39. {941} The operator of a fixed roof tank shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
40. Operator shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
41. Operator shall conduct a TVP and API testing at least once every 24 months during summer (July - September) and/or whenever there is a change in the source or type of organic liquid stored in the tank. Operator shall submit records of TVP and API gravity testing within 45 days of performing the test. These records shall include the tank identification number, PTO number, type of stored organic liquid, TVP and API gravity of the stored organic liquid, test methods used, and a copy of the test results. [District Rules 2201, 2520, 9.3.2.] Federally Enforceable Through Title V Permit
42. The permittee shall maintain records sufficient to demonstrate compliance with the daily emission limit. These records shall contain calculated emission quantity as well as each process variable used in the respective calculations. All records shall be retained on site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 2201, 2520, 9.3.2] Federally Enforceable Through Title V Permit
43. As used in this permit, the term "source or type of petroleum" shall mean petroleum liquids with similar characteristics. The operator shall maintain records of the API gravity of petroleum liquids stored in this unit to determine which oils are from a common source. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
44. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Tank emissions are fugitive emissions not considered to come from a point source. Therefore, the requirements of Rule 4801 (Amended 12/17/92) and 40 CFR Part 60 Subparts K, Ka, and Kb do not apply to this source. A permit shield is granted from these requirements [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-1372-132-4

LEGAL OWNER OR OPERATOR: PLAINS EXPLORATION & PRODUCTION COMPANY

MAILING ADDRESS: ATTN: KENNETH BORK
1200 DISCOVERY DRIVE, SUITE 500
BAKERSFIELD, CA 93309

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
CA

SECTION: 06 TOWNSHIP: 30S RANGE: 22E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 5,000 BBL REJECT TANK (#77) SERVED BY VAPOR RECOVERY SYSTEM LISTED ON S-1372-128: DESIGNATE AS COMPLIANT DORMANT EMISSIONS UNIT

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. No modification to this unit shall be performed without an Authority to Construct for such modifications, except for changes specified in the conditions below. [District Rule 2010] Federally Enforceable Through Title V Permit
4. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
5. While dormant, tank shall be emptied of all fluid, tank may be disconnected from vapor control system and may be open. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Upon recommencing operation of this unit, tank shall be connected to vapor control system and is subject to normal leak free requirements. [District Rule 2080] 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-1372-132-4: Aug 18 2012 2:38PM -- EDGEHILR : Joint Inspection NOT Required

7. {4565} Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070]
8. If this unit has become dormant because it does not comply with District Rules, or if the unit becomes out of compliance with District Rules while it is dormant, operation of the unit is not authorized until an Authority to Construct permit is issued approving all necessary retrofits and permit changes required to comply with the respective District Rules. [District Rule 2080] Federally Enforceable Through Title V Permit
9. Pressure/vacuum relief valves shall be set to open at 2 oz./square inch pressure and 0.5 oz./square inch vacuum. [District Rule 4623] Federally Enforceable Through Title V Permit
10. Vapor compressor shall activate whenever tank internal pressure exceeds 2 oz./square inch. [District NSR Rule] Federally Enforceable Through Title V Permit
11. True vapor pressure (TVP) of any liquid placed, stored or held in the tank shall not exceed 1.60 psia. [District NSR Rule] Federally Enforceable Through Title V Permit
12. There shall be no truck loading or unloading at this facility. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Facility piping system shall be routinely inspected for leaks and all leaks shall be promptly repaired. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Vapor control system efficiency shall be maintained at no less than 99% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Vapor collection system shall not discharge to atmosphere except during breakdown conditions pursuant to Rule 1100. [District Rule 1100] Federally Enforceable Through Title V Permit
16. Liquids from gas/liquid separators shall be pumped back to tanks. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Throughput shall not exceed 100 bbl per day. [District NSR Rule] Federally Enforceable Through Title V Permit
18. VOC emission rate shall not exceed 0.01 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
19. This tank shall be fully enclosed and shall be maintained in a leak-free condition. [District Rule 4623, 5.1.3] Federally Enforceable Through Title V Permit
20. Leak-free is a condition without a gas leak or a liquid leak. [District Rule 4623, 3.17] Federally Enforceable Through Title V Permit
21. A Gas Leak is indicated by a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with the test method in Section 6.4.8. [District Rule 4623, 3.11] Federally Enforceable Through Title V Permit
22. A liquid leak is the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 4623, 3.18] Federally Enforceable Through Title V Permit
23. The pressure-vacuum relief valve shall be set to within ten (10) percent of the maximum allowable working pressure of the tank. The pressure-vacuum relief valve shall be permanently labeled with the operating pressure settings. The pressure-vacuum relief valve shall be properly installed and maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve set pressure. [District Rule 4623, 5.2] Federally Enforceable Through Title V Permit
24. This tank shall be connected to an APCO-approved vapor recovery system that consists of a closed system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be maintained in a leak-free condition. The VOC control device shall reduce the inlet VOC emissions by at least 95 percent by weight as determined by the test method specified in Section 6.4.6. [District Rule 4623, 5.6.1] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

25. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623, 5.6.2] Federally Enforceable Through Title V Permit
26. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623, 5.6.3] Federally Enforceable Through Title V Permit
27. Only operators who elect to participate in the voluntary tank preventive inspection and maintenance, and tank interior cleaning program (program) shall be allowed to use the provisions specified in Tables 3 to 5 and Section 5.7.5. When using Tables 3 to 5 and Section 5.7.5 provisions, operators shall perform the procedures as expeditiously as practicable and minimize emissions to the maximum extent practicable. To participate in this program, the operator shall comply with the requirements of Sections 5.7.1 through 5.7.4. [District Rule 4623, 5.7] Federally Enforceable Through Title V Permit
28. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
29. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
30. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) Eliminate or minimize the leak within 8 hours after detection. (b) If the leak can not be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices; and eliminate the leak within 48 hours after detection. (c) In no event that the total time to minimize and eliminate the leak shall exceed 56 hours after detection. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
31. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of the District Rule 4623. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of the District Rule 4623. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
32. If a component type for a given tank is found to leak during an annual inspection, then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, then revert to annual inspections. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
33. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
34. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
35. Operator shall maintain monthly records of daily average throughput. [District Rule 2520] Federally Enforceable Through Title V Permit
36. {463} Operator shall maintain all records for at least five years and conform to the recordkeeping requirements described in District Rule 2520. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit
37. Operator shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

38. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Tank emissions are fugitive emissions not considered to come from a point source. Therefore, the requirements of Rule 4801 (Amended 12/17/92) and 40 CFR Part 60 Subparts K, Ka, and Kb do not apply to this 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
DRAFT

PERMIT NO: S-1372-222-3

LEGAL OWNER OR OPERATOR: PLAINS EXPLORATION & PRODUCTION COMPANY
MAILING ADDRESS: ATTN: KENNETH BORK
1200 DISCOVERY DRIVE, SUITE 500
BAKERSFIELD, CA 93309

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
CA

SECTION: 36 **TOWNSHIP:** 29S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 1,000 BBL FIXED ROOF CRUDE OIL STORAGE TANK (#6799): DESIGNATE AS COMPLIANT DORMANT EMISSIONS UNIT

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. No modification to this unit shall be performed without an Authority to Construct for such modifications, except for changes specified in the conditions below. [District Rule 2010] Federally Enforceable Through Title V Permit
4. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
5. While dormant, tank shall be emptied of all fluid and tank may be open. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Upon recommencing operation of this unit, tank shall be enclosed with no openings or holes. [District Rule 2080] 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

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DAVID WARNER, Director of Permit Services
S-1372-222-3 : Aug 18 2012 2:39PM -- EDGEHILR : Joint Inspection NOT Required

7. {4565} Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070]
8. If this unit has become dormant because it does not comply with District Rules, or if the unit becomes out of compliance with District Rules while it is dormant, operation of the unit is not authorized until an Authority to Construct permit is issued approving all necessary retrofits and permit changes required to comply with the respective District Rules. [District Rule 2080] Federally Enforceable Through Title V Permit
9. True vapor pressure of any organic liquid introduced to the tank shall not exceed 0.5 psia at liquid temperature. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
10. This tank shall be equipped with a pressure-vacuum (PV) relief valve set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve's set pressure. [District Rule 4623, 5.2] Federally Enforceable Through Title V Permit
11. The operator shall conduct a TVP testing of each uncontrolled fixed roof tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in each tank. In lieu of testing each uncontrolled fixed roof tank, an operator may conduct a TVP testing of a representative tank provided the requirements of Sections 6.2.1.1.1 through 6.2.1.1.5 are met. The operator shall also comply with Section 6.2.1.2. The operator shall submit the records of TVP and/or API gravity testing to the APCO as specified in Section 6.3.6. [District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
12. The operator shall submit the records of TVP and API gravity testing conducted in accordance with the requirements of Section 6.2 to the APCO within 45 days after the date of testing. The record shall include the tank identification number, PTO number, type of stored organic liquid, TVP and API gravity of the stored organic liquid, test methods used, and a copy of the test results. [District Rule 4623, 6.3.6] Federally Enforceable Through Title V Permit
13. {2589} For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623, 6.4.4] Federally Enforceable Through Title V Permit
14. The operator shall keep an accurate record of each organic liquid stored in each tank, including its storage temperature, TVP, and API gravity. Such records shall be retained for at least five years and made available to the District upon request. [District Rule 4623, 6.3.1] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

DRAFT

PERMIT NO: S-1372-223-3

LEGAL OWNER OR OPERATOR: PLAINS EXPLORATION & PRODUCTION COMPANY

MAILING ADDRESS: ATTN: KENNETH BORK
1200 DISCOVERY DRIVE, SUITE 500
BAKERSFIELD, CA 93309

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
CA

SECTION: 36 **TOWNSHIP:** 29S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 2,019 BBL FIXED ROOF CRUDE OIL STORAGE TANK #WP-WT-2 AND THREE FREE WATER KNOCKOUT VESSELS (WELLPORT): DESIGNATE AS COMPLIANT DORMANT EMISSIONS UNIT

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. No modification to this unit shall be performed without an Authority to Construct for such modifications, except for changes specified in the conditions below. [District Rule 2010] Federally Enforceable Through Title V Permit
4. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
5. While dormant, tank shall be emptied of all fluid and tank may be open. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Upon recommencing operation of this unit, tank shall be enclosed with no openings or holes. [District Rule 2080] 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

DRAFT

DAVID WARNER, Director of Permit Services

S-1372-223-3 : Aug 18 2012 2:39PM -- EDGEHILR : Joint Inspection NOT Required

7. {4565} Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070]
8. If this unit has become dormant because it does not comply with District Rules, or if the unit becomes out of compliance with District Rules while it is dormant, operation of the unit is not authorized until an Authority to Construct permit is issued approving all necessary retrofits and permit changes required to comply with the respective District Rules. [District Rule 2080] Federally Enforceable Through Title V Permit
9. True vapor pressure of any organic liquid introduced to the tank shall not exceed 0.5 psia at liquid temperature. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
10. This tank shall be equipped with a pressure-vacuum (PV) relief valve set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve's set pressure. [District Rule 4623, 5.2] Federally Enforceable Through Title V Permit
11. The operator shall conduct a TVP testing of each uncontrolled fixed roof tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in each tank. In lieu of testing each uncontrolled fixed roof tank, an operator may conduct a TVP testing of a representative tank provided the requirements of Sections 6.2.1.1.1 through 6.2.1.1.5 are met. The operator shall also comply with Section 6.2.1.2. The operator shall submit the records of TVP and/or API gravity testing to the APCO as specified in Section 6.3.6. [District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
12. The operator shall submit the records of TVP and API gravity testing conducted in accordance with the requirements of Section 6.2 to the APCO within 45 days after the date of testing. The record shall include the tank identification number, PTO number, type of stored organic liquid, TVP and API gravity of the stored organic liquid, test methods used, and a copy of the test results. [District Rule 4623, 6.3.6] Federally Enforceable Through Title V Permit
13. {2589} For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623, 6.4.4] Federally Enforceable Through Title V Permit
14. The operator shall keep an accurate record of each organic liquid stored in each tank, including its storage temperature, TVP, and API gravity. Such records shall be retained for at least five years and made available to the District upon request. [District Rule 4623, 6.3.1] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1372-224-3

LEGAL OWNER OR OPERATOR: PLAINS EXPLORATION & PRODUCTION COMPANY
MAILING ADDRESS: ATTN: KENNETH BORK
1200 DISCOVERY DRIVE, SUITE 500
BAKERSFIELD, CA 93309

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
CA

SECTION: 36 **TOWNSHIP:** 29S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 2,019 BBL FIXED ROOF CRUDE OIL STORAGE TANK (#10635): DESIGNATE AS COMPLIANT DORMANT EMISSIONS UNIT

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. No modification to this unit shall be performed without an Authority to Construct for such modifications, except for changes specified in the conditions below. [District Rule 2010] Federally Enforceable Through Title V Permit
4. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
5. While dormant, tank shall be emptied of all fluid and tank may be open. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Upon recommencing operation of this unit, tank shall be enclosed with no openings or holes. [District Rule 2080] 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-1372-224-3 : Aug 18 2012 2:39PM -- EDGEHILR : Joint Inspection NOT Required

7. {4565} Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070]
8. If this unit has become dormant because it does not comply with District Rules, or if the unit becomes out of compliance with District Rules while it is dormant, operation of the unit is not authorized until an Authority to Construct permit is issued approving all necessary retrofits and permit changes required to comply with the respective District Rules. [District Rule 2080] Federally Enforceable Through Title V Permit
9. True vapor pressure of any organic liquid introduced to the tank shall not exceed 0.5 psia at liquid temperature. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
10. This tank shall be equipped with a pressure-vacuum (PV) relief valve set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve's set pressure. [District Rule 4623, 5.2] Federally Enforceable Through Title V Permit
11. The operator shall conduct a TVP testing of each uncontrolled fixed roof tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in each tank. In lieu of testing each uncontrolled fixed roof tank, an operator may conduct a TVP testing of a representative tank provided the requirements of Sections 6.2.1.1.1 through 6.2.1.1.5 are met. The operator shall also comply with Section 6.2.1.2. The operator shall submit the records of TVP and/or API gravity testing to the APCO as specified in Section 6.3.6. [District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
12. The operator shall submit the records of TVP and API gravity testing conducted in accordance with the requirements of Section 6.2 to the APCO within 45 days after the date of testing. The record shall include the tank identification number, PTO number, type of stored organic liquid, TVP and API gravity of the stored organic liquid, test methods used, and a copy of the test results. [District Rule 4623, 6.3.6] Federally Enforceable Through Title V Permit
13. {2589} For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623, 6.4.4] Federally Enforceable Through Title V Permit
14. The operator shall keep an accurate record of each organic liquid stored in each tank, including its storage temperature, TVP, and API gravity. Such records shall be retained for at least five years and made available to the District upon request. [District Rule 4623, 6.3.1] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-1372-225-3

LEGAL OWNER OR OPERATOR: PLAINS EXPLORATION & PRODUCTION COMPANY
MAILING ADDRESS: ATTN: KENNETH BORK
1200 DISCOVERY DRIVE, SUITE 500
BAKERSFIELD, CA 93309

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
CA

SECTION: 36 TOWNSHIP: 29S RANGE: 21E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 2,019 BBL FIXED ROOF CRUDE OIL STORAGE TANK (#10646): DESIGNATE AS COMPLIANT DORMANT EMISSIONS UNIT

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. No modification to this unit shall be performed without an Authority to Construct for such modifications, except for changes specified in the conditions below. [District Rule 2010] Federally Enforceable Through Title V Permit
4. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
5. While dormant, tank shall be emptied of all fluid and tank may be open. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Upon recommencing operation of this unit, tank shall be enclosed with no openings or holes. [District Rule 2080] 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-1372-225-3: Aug 18 2012 2:39PM -- EDGEHILL : Joint Inspection NOT Required

7. {4565} Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070]
8. If this unit has become dormant because it does not comply with District Rules, or if the unit becomes out of compliance with District Rules while it is dormant, operation of the unit is not authorized until an Authority to Construct permit is issued approving all necessary retrofits and permit changes required to comply with the respective District Rules. [District Rule 2080] Federally Enforceable Through Title V Permit
9. True vapor pressure of any organic liquid introduced to the tank shall not exceed 0.5 psia at liquid temperature. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
10. This tank shall be equipped with a pressure-vacuum (PV) relief valve set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve's set pressure. [District Rule 4623, 5.2] Federally Enforceable Through Title V Permit
11. The operator shall conduct a TVP testing of each uncontrolled fixed roof tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in each tank. In lieu of testing each uncontrolled fixed roof tank, an operator may conduct a TVP testing of a representative tank provided the requirements of Sections 6.2.1.1.1 through 6.2.1.1.5 are met. The operator shall also comply with Section 6.2.1.2. The operator shall submit the records of TVP and/or API gravity testing to the APCO as specified in Section 6.3.6. [District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
12. The operator shall submit the records of TVP and API gravity testing conducted in accordance with the requirements of Section 6.2 to the APCO within 45 days after the date of testing. The record shall include the tank identification number, PTO number, type of stored organic liquid, TVP and API gravity of the stored organic liquid, test methods used, and a copy of the test results. [District Rule 4623, 6.3.6] Federally Enforceable Through Title V Permit
13. {2589} For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623, 6.4.4] Federally Enforceable Through Title V Permit
14. The operator shall keep an accurate record of each organic liquid stored in each tank, including its storage temperature, TVP, and API gravity. Such records shall be retained for at least five years and made available to the District upon request. [District Rule 4623, 6.3.1] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-1372-409-1

LEGAL OWNER OR OPERATOR: PLAINS EXPLORATION & PRODUCTION COMPANY

MAILING ADDRESS: ATTN: KENNETH BORK
1200 DISCOVERY DRIVE, SUITE 500
BAKERSFIELD, CA 93309

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
CA

SECTION: NE06 TOWNSHIP: 30S RANGE: 22E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 1000 BBL FIXED ROOF WASH TANK WITH PV VENT (CYMRIC OIL FIELD):DESIGNATE AS COMPLIANT DORMANT EMISSIONS UNIT

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. No modification to this unit shall be performed without an Authority to Construct for such modifications, except for changes specified in the conditions below. [District Rule 2010] Federally Enforceable Through Title V Permit
4. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
5. While dormant, tank shall be emptied of all fluid, tank may be open, and leak-free conditions pertaining to relief valve shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Upon recommencing operation of this unit, tank shall be enclosed with no holes or openings and shall be subject to normal leak free requirements pertaining to relief valve. [District Rule 2080] 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-1372-409-1: Aug 18 2012 2:40PM -- EDGEHILL : Joint Inspection NOT Required

7. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070]
8. If this unit has become dormant because it does not comply with District Rules, or if the unit becomes out of compliance with District Rules while it is dormant, operation of the unit is not authorized until an Authority to Construct permit is issued approving all necessary retrofits and permit changes required to comply with the respective District Rules. [District Rule 2080] Federally Enforceable Through Title V Permit
9. The tank shall be equipped with a fixed roof with no holes or openings. [District Rule 4623] Federally Enforceable Through Title V Permit
10. Tank shall be operated at a constant level. [District Rule 2201] Federally Enforceable Through Title V Permit
11. True vapor pressure of any liquid placed or stored in this tank shall not exceed 0.1 psia. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
12. Daily average tank crude oil throughput shall not exceed 20 barrels per day. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
13. This tank shall be equipped with a pressure-vacuum (PV) relief valve set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in gas-tight condition except when the operating pressure exceeds the valve's set pressure. [District Rule 4623] Federally Enforceable Through Title V Permit
14. Permittee shall conduct True Vapor Pressure (TVP) and API gravity testing of the crude oil stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank. [District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
15. In lieu of testing each uncontrolled fixed roof tank, the permittee may conduct a TVP testing of the organic liquid stored in a representative tank provided the requirements of Sections 6.2.1.1.1 through 6.2.1.1.5 are met. [District Rule 4623, 6.2.1] Federally Enforceable Through Title V Permit
16. True vapor pressure shall be measured using Reid vapor pressure ASTM Method D323-94, and converting the RVP to TVP at the tank's maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance of the oil and gas section of "California Air Resources Boards (ARB) Technical Guidance Document to the Criteria and Guidelines Regulations for AB 2588", dated August 1989. As an alternative to using ASTM D 323-94, the TVP of crude oil with an API gravity range of greater than 20 degrees up to 30 degrees may be determined by using other equivalent test methods approved by APCO, ARB and EPA. [District Rule 4623, 6.4.3] Federally Enforceable Through Title V Permit
17. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287-92 (2000) e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057-95 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623, 6.4.2] Federally Enforceable Through Title V Permit
18. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623, 6.3.6] Federally Enforceable Through Title V Permit
19. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623, 6.3.1] Federally Enforceable Through Title V Permit
20. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-1372-410-1

LEGAL OWNER OR OPERATOR: PLAINS EXPLORATION & PRODUCTION COMPANY
MAILING ADDRESS: ATTN: KENNETH BORK
1200 DISCOVERY DRIVE, SUITE 500
BAKERSFIELD, CA 93309

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
CA

SECTION: NE06 **TOWNSHIP:** 30S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 200 BBL FIXED ROOF STOCK TANK WITH PV VENT (CYMRIC OIL FIELD): DESIGNATE AS COMPLIANT DORMANT EMISSIONS UNIT

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
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Seyed Sadredin, Executive Director, APCO

DAVID WARNER, Director of Permit Services
S-1372-410-1: Aug 18 2012 2:40PM - EDGEHILR : Joint Inspection NOT Required

7. {4565} Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070]
8. If this unit has become dormant because it does not comply with District Rules, or if the unit becomes out of compliance with District Rules while it is dormant, operation of the unit is not authorized until an Authority to Construct permit is issued approving all necessary retrofits and permit changes required to comply with the respective District Rules. [District Rule 2080] Federally Enforceable Through Title V Permit
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