

# South Coast Air Quality Management District

## Statement of Basis

### Proposed Title V Renewal Permit

**Facility Name:** Berry Petroleum Company  
**Facility ID:** 119907  
**SIC Code:** 1311  
**Equipment Location:** 25121 N. Sierra Hwy.,  
Santa Clarita, CA 91321

**Application #(s):** 545847  
**Application Submittal Date(s):** 12/19/2012

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#### 1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

Pursuant to Title V of the federal Clean Air Act and AQMD Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and requested the AQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. NO<sub>2</sub>, SO<sub>2</sub>, CO, and lead are in attainment with federal standards. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment.

A Title V renewal permit is proposed to be issued to cover the operations of Berry Petroleum Company located at 25121 N. Sierra Hwy., Santa Clarita, CA 91321. This facility is subject to Title V requirements because it is a major source.

## **2. Facility Description**

This is an existing facility applying for a Title V permit renewal that is in the business of oil and gas production. This facility is operating gas turbines, steam generators, oil/gas/water separation systems, bulk loading equipment and wastewater separation system.

## **3. Construction and Permitting History**

The facility has been in constant operation for a number of years. Berry Petroleum Company assumed ownership of this facility in 1998. The initial Title V facility permit was issued to Berry Petroleum Company on June 1, 2008.

## **4. Regulatory Applicability Determinations**

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Section D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. NSPS requirements of 40 CFR Part 60 apply to certain units at the facility and the permit terms and conditions may be found in Sections D and H of the Title V permit.

## **5. Monitoring and Operational Requirements**

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Section D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable operational requirements can be found in the Engineering Evaluations. All periodic monitoring requirements were developed using strict adherence to the following applicable guidance documents: SCAQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997); CAPCOA/CARB/EPA Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP (June 1999); and CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources (July 2001).

Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 is not applicable to the above air pollution control equipment.

## **6. Permit Features**

### Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all

identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

**Streamlining Requirements**

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

**7. Summary of Emissions and Health Risks**

**Criteria Pollutant Emissions (tons/year)  
Annual Reported Emissions for Reporting Period 2012**

Pollutant	Emissions (tons/year)
NOx	66.757
CO	53.407
VOC	66.109
PM	7.698
SOx	0.979

**Toxic Air Contaminants Emissions (TAC)  
Annual Reported Emissions for Reporting Period 2012**

The Following TACs Were Reported	Emissions (lbs/yr)
Benzene	53.244
Perchloroethylene	3.990
Formaldehyde	2771.712
Ammonia	89597.609
Naphthalene	5.415
PAH, total, with components reported	3.613
Trichloroethylene	3.990

**Health Risk from Toxic Air Contaminants**

The facility is subject to review under the Air Toxics Information and Assessment Act (AB2588) and AQMD is tracking the status of this facility.

## **8. Compliance History**

As noted, the facility has been in constant operation with a Title V permit since 2008. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaints filed in the last two years. The facility has had no Notices of Violation issued in the last two years. However, the facility was issued one Notice to Comply in the last two years for failing to transmit electronic reports of NOx emissions and status codes for devices #1 & #5 on 11/27/11. The facility has since provided this data.

## **9. Compliance Certification**

By virtue of the Title V permit application and issuance of this Title V renewal permit, the reporting frequency for compliance certification for the facility shall be annual.