VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT

669 County Square Drive
Ventura, CA 93003
805/645-1400

PART 70 PERMIT

Number 01493

Permit Term: April 1, 2013 to March 31, 2018

Company Name / Address:
Venoco, Inc.
6267 Carpinteria Avenue, Suite 100
Carpinteria, CA 93013-1423

Facility Name / Address:
Platform Grace
OCS Lease P-0217
Offshore of Ventura, CA

Responsible Official:
Mr. Larry Huskins
Operations Manager
805/745-2284

Title V Contact:
Mr. Pat Corcoran
Environmental Coordinator
805/745-2264

The Part 70 permit consists of this page and the tables, attachments and conditions listed in the attached table of contents. The Part 70 permit application is included for reference only and is not a part of the Part 70 permit.

Pursuant to Rule 33.1, the Part 70 permit shall also serve as a permit to operate issued to fulfill the requirements of Rule 10.B.

For:

Terri Thomas, Supervisor
Engineering Division

Michael Villegas
Air Pollution Control Officer

Issue Date

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Note: The Part 70 permit application is included for reference only and is not a part of the Part 70 permit.

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1.a. PERMIT REVISONS TABLE

Application No.	Issue Date	Description / Category	Revised Permit Sections
01493-181	11/30/98	Replaced Work Boat / Minor Part 70 Permit Modification	• Signature Cover Page • Table No. 2 • Table No. 3 • Table No. 4
01493-TOO	03/17/99	Transfer of Ownership / Administrative Part 70 Permit Amendment	• Signature Cover Page • Table of Contents • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO1493PC1
01493-201	09/28/99	Replaced Work Boat / Minor Part 70 Permit Modification	• Signature Cover Page • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4
01493-ADM2	04/26/00	Administrative Amendment to revise permitted emissions to reflect the use of standard calculation methods for oil storage tanks, turbines, and flares	• Signature Cover Page • Permit RevisionsTable • Table No. 3 • Table No. 4 • Attachment PO1493PC1
01493-211	11/13/00	Additional crew boat and work boat engines / Minor Part 70 Permit Modification	• Signature Cover Page • Table of Contents • Permit Revisions Table • Periodic Monitoring Summary • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO1493PC1
01493-221	08/27/01	Modify Permit Condition Flare Gas Limits / Minor Part 70 Permit Modification Administrative Amendment to change company address and phone numbers	• Signature Cover Page • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO1493PC2

Application No.	Issue Date	Description / Category	Revised Permit Sections
01493-241	11/29/01	Additional work boat engines / Minor Part 70 Permit Modification	• Signature Cover Page • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO1493PC1
01493-231	05/28/02	Remove emission units / Non-Federal Minor Change	• Signature Cover Page • Table of Contents • Permit Revisions Table • Periodic Monitoring Summary • Table No. 2 • Table No. 3 • Table No. 4 • Exempt Equipment List • Attachment PO1493PC1 • Attachment PO1493PC3 • *Remove* Attachment PO1493PC7
01493-251	04/08/03	Permit Reissuance for Period: April 1, 2003 – March 31, 2008	See "Stationary Source Description"
01493-261	12/31/03	Additional crew boat engines / Minor Part 70 Permit Modification	• Signature Cover Page • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO1493PC1
01493-271	11/01/04	Additional crew boat engines / Minor Part 70 Permit Modification	• Signature Cover Page • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO1493PC1
01493-281	03/18/2005	Additional work boat engines / Minor Part 70 Permit Modification	• Signature Cover Page • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO1493PC1

Application No.	Issue Date	Description / Category	Revised Permit Sections
01493-291	08/08/05	Permit Existing Emergency Diesel Engine / Minor Part 70 Permit Modification	• Signature Cover Page • Table of Contents • Permit Revisions Table • Periodic Monitoring Table • Table No. 2 • Applicable Requirements Code Key • Table No. 3 • Table No. 4 • Exempt Equipment List • Attachment ATCM Engine N3 • Attachment 57.1 • *Remove Attachment 57.B* • *Remove Attachment 68*
01493-311	01/09/06	Additional crew boat engines / Minor Part 70 Permit Modification	• Signature Cover Page • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO1493PC1 • Attachment 74.6(2003)
01493-341	04/16/07	• Additional crew boat engines • Corrected BHP for crew boat engines • Updated Rule 74.9 requirements Minor Part 70 Permit Modifications	• Signature Cover Page • Permit Revisions Table • Periodic Monitoring Table • Table No. 2 • Table No. 3 • Table No. 4 • Oil Well List • Attachment 74.9N3 • Attachment 74.9N7 • Attachment 74.9N8 • Attachment 74.9N9 • Attachment PO1493PC1 • Attachment PO1493PC5
01493-351	04/07/08	Permit Reissuance for Term April 7, 2008 to March 31, 2013	See "Permit Summary and Statement of Basis"

Application No.	Issue Date	Description / Category	Revised Permit Sections
01493-301 01493-321	02/03/09	Permit five 915 BHP natural gas engines and one 1791 BHP diesel backup generator engine pursuant to Authority to Construct Nos. 01493-300 and 01493-320 Removal of Tanks T21B, T25, and T22	• Signature Cover Page • Table of Contents • Permit Revisions Table • Permit Summary and Statement of Basis • Periodic Monitoring Summary • Table No. 2 • Applicable Requirement Code Key • Table No. 3 • Table No. 4 • Attachment PO1493PC1 • Attachment PO1493PC5 • Attachment PO1493PC7 *new* • Attachment PO1493PC8 *new*
01493-361	04/02/09	Increase the gas throughput limit at the two flares / Minor Part 70 Permit Modification	• Signature Cover Page • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO1493PC2
01493-371	08/10/09	Two additional work boats / Minor Part 70 Permit Modification Removed 1791 BHP diesel backup generator	• Signature Cover Page • Table of Contents • Permit Revisions Table • Permit Summary and Statement of Basis • Periodic Monitoring Summary • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO1493PC1 • *Remove* Attachment PO1493PC8

Application No.	Issue Date	Description / Category	Revised Permit Sections
01493-391	02/12/10	Crew boat added to permit / Minor Part 70 Permit Modification	• Signature Cover Page • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO1493PC1
01493-401	10/20/10	Minor Part 70 Permit Modification, to reflect an exemption from testing the engines that are out of service.	• Signature Cover Page • Permit Revisions Table • Attachment 74.9N3
01493-411	11/27/12	Boat Changes – Added Exempt Pit / Minor Part 70 Permit Modification	• Signature Cover Page • Table of Contents • Permit Revisions Table • Table No. 2 • Table No. 3 • Table No. 4 • Attachment PO1493PC1 • Attachment PO1493PC8
01493-421		Permit Reissuance for Five-Year Term Ending March 31, 2018	See "Permit Summary and Statement of Basis"

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1.b. PERMIT SUMMARY AND STATEMENT OF BASIS

Stationary Source Description

This stationary source is an oil platform, Platform Grace, located offshore of Ventura, California. The platform is located in the Outer Continental Shelf (OCS) Area which is the offshore waters between three (3) and twenty-five (25) miles out from the coastline. The platform has been designated to the VCAPCD as the corresponding onshore area by the U.S. EPA. The source is a crude oil production facility and has a Standard Industrial Classification (SIC) Code of 1311, Crude Oil Production. The source operates various oil production and processing equipment, including wells, tanks, flares, natural gas fired engines, and diesel engines. The six natural gas fired engines provide electrical power for the platform. The diesel engines on the platform are used for the operation of cranes, for backup electrical power, and for a fire suppression system. This stationary source is subject to the Part 70 permit program based upon the carbon monoxide (CO) potential to emit.

As discussed in more detail throughout this Permit Summary and Statement of Basis, this permit applies to emissions units that are required to have a permit to operate pursuant to District Rule 10, "Permits Required", and District Rule 23, "Exemptions from Permit". These emissions units are listed in Table No. 2 in Section No. 2 of this permit. However, as discussed below, some equipment that is exempt from permit pursuant to District Rule 23, "Exemptions from Permit", may be subject to District rules such as District Rule 50, "Opacity". This includes "Insignificant Activities" as listed in Section No. 6 of the permit. In addition, "Short Term Activities" as listed in Section No. 10 of the permit are subject to certain rules and regulations. This permit does not shield the permittee from complying with any Federal, State, or District rule or regulation that is not specifically addressed in the permit or any rule or regulation that may come into effect during the term of the permit.

Stationary Source Emissions

In Ventura County, the Part 70 permit thresholds are 50 tons per year for ROC and NOx and 100 tons per year for PM, SOx, and CO as Ventura County has a "Serious" Nonattainment Classification with the federal ozone standard. This stationary source is subject to the Part 70 permit program based upon the carbon monoxide (CO) potential to emit in excess of the threshold as shown in Table No. 4 in Section No. 4 of this Permit to Operate. The purpose of Table No. 4 is to document the permitted emissions of the criteria pollutants ROC, NOx, PM, SOx, and CO for this stationary source. District Rule 29, "Conditions on Permits", requires permitted emissions to be included on each Permit to Operate. District Rule 29 requires that annual permitted emissions be based on a 12 calendar month rolling period and be expressed in units of tons per year. Hourly permitted emissions are required to be expressed in units of pounds per hour. Permitted emissions for a stationary source are required to be determined by aggregating the permitted emissions for each emissions unit at the stationary source.

Criteria pollutant emissions (ROC, NOx, PM, SOx, and CO) result from the combustion of diesel fuel, natural gas, and produced gas in the engines and flares. Criteria pollutants are also emitted from the diesel and gasoline engines associated with the crew boats, work boats, and boom boats.

Reactive Organic Compound (ROC) emissions result from the storage, handling, and loading of crude oil.

This stationary source is not a major source of federal Hazardous Air Pollutants (HAPs). The source is well below the HAP major source levels of 10 tons per year of a single HAP or 25 tons per year of combined HAPs. As an area (non-major) source of hazardous air pollutants, there are no major source Maximum Achievable Control Technology (MACT) standards that apply to this facility. As discussed below, there are area source MACT requirements that do apply. The Part 70 Permit re-issuance application includes a summary of HAPs emissions (in the units of pounds per year). The purpose of the Air Toxics "Hot Spots" Information and Assessment Act of 1987 (California Health and Safety Code Section 44300) is to collect air toxics emission data, to identify facilities having localized adverse health impacts, to ascertain health risks, to notify nearby workers and residents of significant risks, and to reduce significant risks if they exist. Platform Grace has not been subject to the State of California AB2588 Air Toxics "Hot Spot" Program because of its offshore location.

The United States EPA has added greenhouse gases (GHGs) to the list of regulated air pollutants. As of January 2, 2011, EPA has required that GHGs be calculated for each Title V stationary source and included in the Part 70 Permit. EPA has "tailored" the regulations to include GHGs, such that the Title V applicability for the stationary source based on GHGs alone is emissions of 100,000 tons per year of CO_2 equivalent emissions (CO_{2e}). Greenhouse gases are defined as the aggregate group of six greenhouse gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons (by category), perfluorocarbons (by category), and sulfur hexafluoride. CO_{2e} is the amount of greenhouse gases emitted relative to the global warming potential of each pollutant. The CO_{2e} potential to emit for this stationary source has been calculated to be 17,205 tons per year. This potential to emit is based on the permitted annual combustion and operational (hours per year) limits listed in Table No. 3 of the permit. The District has used emission factors of 10.14 kg CO_{2e}/gallon diesel (22.33 lb CO_{2e}/gallon diesel) and 53.02 kg CO_{2e}/MMBTU natural gas (116.78 lb CO_{2e}/MMBTU natural gas) from the *Regulation For The Mandatory Reporting of Greenhouse Gas Emissions*, California Code of Regulations, title 17, Subchapter 10, Article 2, sections 95100 to 95133; Appendix A, Table 4. This CO2e potential to emit does not include insignificant activities or equipment exempt from permit pursuant to Rule 23, "Exemptions From Permit".

Compliance History

Upon reissuance of this Part 70 permit, the facility was determined to be in compliance with all applicable requirements. The facility is currently in compliance with the Part 70 Permit as reissued. The permit includes requirements for the RICE MACT (40 CFR Part 63 Subpart ZZZZ) which has future effective dates of May 3, 2013 and October 19, 2013. For the time period January 1, 1996 to March 22, 2013, the facility received seven (7) Notices of Violation (NOV) as detailed in the "NOV by Facility" history for Facility No. 01493 located at the end of this section of the Part 70 permit. For the time period January 1, 1996 to March 22, 2013, the facility received ten (10) Notices to Comply (NTC) as detailed in the "NTC by Facility" history for Facility No. 01493 located at the end of this section of the Part 70 permit.

Equipment Description and Applicable Requirements - General

Applicable requirements for this stationary source are listed throughout the permit. The Table of Contents in the front of the permit summarizes the applicable requirements including the equipment specific requirements, the general applicable requirements, and the applicable requirements for short-term activities. Table No. 2 in Section No. 2 of this Permit to Operate details the applicable requirements for specific emissions units at the facility. Permit conditions that enforce these requirements are listed in Section No. 7, "Specific Applicable Requirements" and Section No. 8, "Permit Specific Conditions" of this permit.

In addition to the emission unit specific requirements in Section No. 7 and Section No. 8, there are additional general requirements that may apply to the emissions units listed in this table, or to the stationary source as a whole. Furthermore, some general requirements may apply to emissions units or short-term activities not required to be specifically listed on the permit. These general requirements are contained in the following sections of the Permit: Section No. 9, "General Applicable Requirements"; Section No. 10, "General Requirements for Short-Term Activities"; Section No. 11, "General Permit Conditions"; and Section No. 12, "Miscellaneous Federal Program Conditions". A detailed applicability discussion and additional legal basis for the permit condition(s) is included with each attachment or set of permit conditions.

Equipment Description and Applicable Requirements - Specific

At the time of permit reissuance, there is minor production of oil and gas from existing wells. The platform is also used as a transfer station for oil and gas production from Platform Gail to an onshore processing facility in Carpinteria.

The tanks at this facility are subject to Rule 71.1, "Crude Oil Production and Separation". The tanks are equipped with vapor recovery for Rule 71.1 compliance. The wastewater sumps are exempt from the cover requirements of Rule 71.4, "Petroleum Sumps, Pits, Ponds and Well Cellars", based on the low ROC content exemption. As shown in the permitted equipment tables, some of the tanks are designated as Out of Service (OOS). The Out of Service designation means that the tank is shut down and not in operation and is not required to comply with vapor recovery or other requirements. The Out of Service requirements are detailed in Attachment PO1493PC4.

The six natural gas-fired, rich-burn, engines (one Waukesha and five Caterpillar) are equipped with non-selective catalytic reduction systems for NOx control in order to comply with Rule 74.9, "Stationary Internal Combustion Engines", and the best available control technology (BACT) requirements of Rule 26, "New Source Review". The engines all have ROC, NOx, and CO limits pursuant to Rule 74.9, Rule 26, and Rule 35. The engines are also required to comply with 40 CFR Part 64, "Compliance Assurance Monitoring" (CAM). Additional daily monitoring beyond the requirements of Rule 74.9 is required by CAM. The natural gas engines must comply with the emission limit of the EPA MACT for Reciprocating Internal Combustion Engines (RICE), 40 CFR, Part 63, Subpart ZZZZ. The compliance date is October 19, 2013.

Rule 74.9, "Stationary Internal Combustion Engines", exempts diesel engines used to power cranes from the emission limits of the rule. The backup diesel engine is exempt from Rule 74.9 emission limits because it has a permitted annual diesel fuel limit that is less than 15 percent of the annual capacity for the unit. The emergency engine used for fire suppression is also exempt from the emission limits of Rule 74.9. These engines are required to comply with the recordkeeping and reporting requirements of Rule 74.9. These diesel gas engines must comply with the operational requirements (no emission limits) of the EPA MACT for Reciprocating Internal Combustion Engines (RICE), 40 CFR, Part 63, Subpart ZZZZ. The compliance date is May 13, 2013.

The diesel engines are subject to the California Airborne Toxic Control Measure (ATCM) For Stationary Compression Ignition Engines; however, the ATCM exempts engines operated on OCS Platforms from the emission standards of the ATCM. The engines are required to comply with the fuel and the recordkeeping requirements of the ATCM.

This stationary source is subject to the fugitive leak and inspection requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".

The oil platform is located in the Outer Continental Shelf; and therefore, is subject to 40 CFR Part 55, "Outer Continental Shelf Air Regulations". 40 CFR Part 55 includes the District rules by reference, thereby making them federally enforceable. The versions of the rules referenced in 40 CFR Part 55 are included in the rule attachments of this permit if an OCS version is not the most recent version of a rule or not the otherwise federally enforceable version of a rule. 40 CFR Part 55 does not provide the authority to control the emissions from the vessels that service the platform, but does require that the vessel emissions be included in the permitted emissions for the OCS source. Therefore the engines on the work boats and crew boats servicing the platform and the permitted emissions for the engines are included in the Part 70 permit.

This stationary source has stated that 40 CFR Part 68, "Chemical Accident Prevention Provisions", is not an applicable requirement. Therefore, a federal Risk Management Plan, pursuant to section 112(r) of the federal Clean Air Act as amended, is not required.

The stationary source is subject to 40 CFR Part 60, Subpart OOOO, "Standards of Performance (NSPS) for Crude Oil and Natural Gas Production, Transmission, and Distribution." The NSPS applies to all well completions, pneumatic controllers, equipment leaks from natural gas processing plants, reciprocating compressors, centrifugal compressors and storage vessels which are constructed, modified, or reconstructed after August 23, 2011.

Permit Revisions Summary

The Permit Revisions Table (located in Section No. 1 of the permit) is a list of all permit revisions since Part 70 Permit No. 01493 was initially issued on April 1, 1998. A portion of the permit revisions are described in further detail below. The District's Engineering Analysis for each application can also be consulted for further details.

Application No. 01493-251: Application No. 01493-251 is for the reissuance of Part 70 Permit No. 01493 for the period April 1, 2003 to March 31, 2008. The following items summarize the changes from the initial Part 70 Permit No. 01493 (April 1, 1998 to March 31, 2003):

- This "Stationary Source Description" has been added to the permit. It was not included in the initial Part 70 Permit No. 01493.
- An attachment detailing the requirements of Rule 74.9, "Stationary Internal Combustion Engines", that apply to emergency standby stationary internal combustion engines rated at 50 or more horsepower and operated during an emergency or maintenance operation has been added to the permit. Rule 23.D.7 exempts these engines from permit requirements. These types of engines have been specifically listed in the Exempt Equipment List and now are also generally listed in Tables 2, 3, and 4 of the permit.
- The Solar Centaur 2.8 MW turbines and associated Detroit Diesel turbine starter engine have been removed from the platform.
- 40 CFR Part 64, "Compliance Assurance Monitoring", requirements for the 773 BHP Waukesha natural gas fired engine have been included in the permit.
- An attachment detailing the applicable requirements of Rule 74.11.1, "Large Water Heaters and Small Boilers", has been added to the permit.
- The following District rules have been revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the initial issuance of Part 70 Permit No. 01493:
  a) Rule 57, "Combustion Contaminants – Specific"
  b) Rule 64, "Sulfur Content of Fuels"
  c) Rule 68, "Carbon Monoxide"
  d) Rule 74.1, "Abrasive Blasting"
  e) Rule 74.2, "Architectural Coatings"
  f) Rule 74.6, "Surface Cleaning and Degreasing"
  g) Rule 74.9, "Stationary Internal Combustion Engines"
  h) Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"

Application No. 01493-351: Application No. 01493-351 is for the reissuance of Part 70 Permit No. 01493 for the period April 7, 2008 to March 31, 2013. The following items summarize the changes due to this reissuance application:

- Signature Cover Page revisions: Address information for Venoco, Inc. has been updated to include "Suite 100" and the Responsible Official's phone number has been changed.
- The wipecleaning operation has been removed from the permit due to changes in Rule 23, "Exemptions From Permit". There is a reduction in the permitted emissions as a result of removing the wipecleaning operation from the permitted emissions table. Rule 74.6, "Surface Cleaning and Degreasing", will remain part of the permit in the "General Requirements" section.
- Revisions have been made to the Insignificant Activities Table.
- Permit Condition Attachment 74.16, "Oilfield Drilling Operations on Platform Grace has been added to the permit.

- The following District rules have been revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the April 1, 2003 to March 31, 2008 reissuance:
  a) Rule 23, "Exemptions From Permit"
  b) Rule 50, "Opacity"
  c) Rule 52, "Particulate Matter – Concentration (Grain Loading)"
  d) Rule 57.1, "Particulate Matter Emissions From Fuel Burning Equipment"
  e) Rule 74.2, "Architectural Coatings"
  f) California Airborne Toxic Control Measure (ATCM) For Stationary Compression Ignition Engines

Application No. 01493-371: Application No. 01493-371 is for the addition of two work boats to the permit. A 1791 BHP Cummins Diesel Engine used for backup power was removed from the permit as part of this permit modification.

Application No. 01493-421: Application No. 01493-421 is for the reissuance of Part 70 Permit No. 01493 for the five-year period ending March 31, 2018. The following items summarize the changes due to this reissuance application:

- A discussion of Greenhouse Gases (GHGs) has been included in the Permit Summary and Statement of Basis.
- The permit attachment for the California ATCM for Stationary Compression Ignition (CI) Engines requirements has been updated to reflect the 05/19/11 revisions to the regulation.
- Permit attachments have been added to the permit for the "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT).
- Permit condition language has been revised in Attachment PO1493PC2 to account for the changes to the flare permit exemption (Rule 23.A.4)
- Clarification has been added to Attachment PO1493PC3 regarding the definition of "emergency engine" in the RICE MACT versus the definition of "emergency engine" in other rules.
- Clarifications were added to Attachment PO1493PC1 Condition No. 9 and PO1493PC5 Condition No. 3.
- The following District rules have been revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the reissuance for the permit terminating March 31, 2013:
  a) Rule 74.2, "Architectural Coatings"
  b) Rule 74.9, "Stationary Internal Combustion Engines"
  c) Rule 74.11.1, "Large Water Heaters and Small Boilers"

NOV by Facility

Since January 1, 1996

Facility No 01493 Platform Grace

NOV Date	NOV No	Rule Number	Comment	Settlement	Date Closed
06/15/2000	019409	29.C	Permit Condition Not Met - Flare Throughput Limits	$1,000.00	08/01/2000
06/06/2001	019661	74.10	Exceeding Leak threshold - Open-Ended Lines	$1,000.00	07/31/2001
11/08/2004	020896	29.C	Permit Condition Not Met - Failure To Perform Opacity Survey	$2,500.00	12/02/2004
06/29/2005	021111	29.C	Permit Condition Not Met - Flare	$5,000.00	08/17/2005
09/28/2005	021118	29.C	Permit Condition Not Met - Fuel Sulfur Content	$5,000.00	10/19/2005
04/16/2008	021912	71.1.B.1.a	Improper Vapor Recovery System - Vapor Recovery System	$10,000.00	05/29/2008
07/03/2008	022006	29.C	Permit Condition Not Met - Excess NOx Emissions	$5,000.00	08/21/2008
Total for 7 NOVs				$29,500.00	

NTC by Facility

Since January 1, 1996

Facility No 01493 Platform Grace

NTC Date	NTC No	Rule Number	Comment	Date Closed
06/06/2001	C10529	10.A,B	Application #1493-231 received on 08/23/2001 as required. Facility IN COMPLIANCE.	09/05/2001
09/04/2001	C10531	29.C	Information submitted as required, facility IN COMPLIANCE.	10/19/2001
06/27/2002	C10550	29.C	Information received as required, facility In Compliance.	07/22/2002
12/02/2002	C10904	29.C	Received semiannual report on 12/23/02.	12/26/2002
07/19/2004	C10839	10.A,B		08/13/2004
06/29/2005	C11208	10.A,.B	Application received 09/06/05 - Receipt #59834. Facility IN COMPLIANCE.	09/14/2005
06/06/2006	C11228	10.A,B	Application submitted on 06/15/06 as required (Receipt #61972). Facility IN COMPLIANCE.	06/23/2006
09/15/2008	C11822	102	Received source test report on 9/19/08.	09/26/2008
06/30/2009	C11782	10.B		07/07/2009
05/02/2012	C12255	10.A,B		06/05/2012

1.c PERIODIC MONITORING SUMMARY

This periodic monitoring summary is intended to aid the permittee in quickly identifying key monitoring, recordkeeping, and reporting requirements. It is not intended to be used as a "stand alone" monitoring guidance document that completely satisfies the requirements specifically applicable to this facility. The following tables are included in the periodic monitoring summary:

- Table 1.c.1 - Specific Applicable Requirements
- Table 1.c.2 - Permit-Specific Conditions
- Table 1.c.3 - General Applicable Requirements
- Table 1.c.4 - General Requirements for Short-Term Activities

1.c.1 Specific Applicable Requirements

The Specific Applicable Requirements Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 7 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
71.1N1	Rules 71.1.B.1.a, 74.10	•Quarterly inspection of the following components for proper operation: gas compressor, hatches, relief valves, pressure regulators, flare, as applicable •Verbal notice of maintenance activities •Rule 74.10 inspections •Annual compliance certification including verification that tanks are equipped with a vapor recovery system	•Records of quarterly inspections and tank maintenance activities •Rule 74.10 records	None	None	
71.4N3	Rule 71.4.C.1.c	•Annual compliance certification including lab results of ROC content •Routine surveillance ensuring no change in liquid contents or method of operation	•Records of lab results of ROC content	None	ROC Content - EPA Method 8015 and EPA Method 5030	

1.c.1 Specific Applicable Requirements (Continued)

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.9N3	Rules 74.9.B.1 and B.2	•Quarterly NOx and CO emission screening •Biennial Source Test (ROC, NO_x, CO) •Annual compliance certification	•Records of inspections •Records of maintenance	•Actual annual usage •Summary of maintenance and testing •Biennial Source Test Report	•ROC-EPA Method 25 or EPA Method 18 •NO_x-ARB Method 100 •CO-ARB Method 100	
74.9N7	Rule 74.9.D.3	•Annual compliance certification •Hours of operation	•Records of operating hours •Date, time, duration, and reason for emergency operation •Records of engine data	None		
74.9N8	Rule 74.9.D.8	•Annual compliance certification including engine's usage (fuel consumption or operating hours)	•Records of engine data including maximum hourly fuel consumption, actual annual usage, engine manufacturer, model number, operator id number, and engine location	•Report of hours of operation or fuel usage		
74.9N9	Rule 74.9.D.9	•Annual compliance certification •Routine surveillance to ensure diesel-fired engine is used to power cranes and welding equipment only	•Records of engine data including engine function (usage), manufacturer, model number, operator identification number, and engine location	None		
ATCM Engine N3	ATCM for Stationary Compression Ignition Engines - OCS	•Fuel type records •Fuel use records	•Fuel type records •Fuel use records	None	None	Not federally enforceable
40CFR63ZZZZN3	RICE MACT for emergency diesel engines – oil change and inspections	•Maintenance records •Use non-resettable hr meter •Annual compliance certification	•Maintenance records •Hours of operation records	None	None	
40CFR63ZZZZN4	RICE MACT for non-emergency diesel ≤ 300 HP – oil change and inspections	•Maintenance records •Annual compliance certification	•Maintenance records	None	None	
40CFR63ZZZZN7	RICE MACT for SI remote engine > 500 HP - maintenance	•Maintenance records •Annual compliance cert	•Maintenance records	None	None	

1.c.2 Permit-Specific Conditions

The Permit-Specific Conditions Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 8 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO1493PC1 - Condition No. 1	Rules 29 General Recordkeeping	•Annual compliance certification •Monthly records of throughput and consumption	•Monthly records	None	None	
PO1493PC1 – Condition No. 2	Rule 26 Natural Gas Only	•Annual compliance certification	None	None	None	
PO1493PC1 - Condition No. 3	Rule 29 Maximum Number of Oil Wells	•Annual compliance certification	None	None	None	
PO1493PC1 - Condition No. 4	Rule 29 Maximum Sulfur Content of Diesel Fuel	•Fuel records or fuel supplier certification containing sulfur content of each diesel fuel delivery •Annual compliance certification	Fuel records	None	None	
PO1493PC1 - Condition No. 5	Rules 26 and 29 Crew Boat and Work Boat Emission Limits	•Diesel fuel consumption for boats servicing Platforms Grace and Gail •Monthly calculations of emissions (boats) •Annual compliance certification	•Monthly records of diesel fuel consumption •Monthly calculations of emissions (boats)	None	None	
PO1493PC1 – Condition No. 6	Rule 29 Crew Boats Shall Not Be Used Simultaneously	•Maintain a log book of hours and days of crew boat operation •Annual compliance certification	•Maintain a log book of hours and days of crew boat operation	None	None	
PO1493PC1 – Condition No. 7	Rule 29 Work Boats Shall Not Be Used Simultaneously	•Maintain a log book of hours and days of work boat operation •Annual compliance certification	•Maintain a log book of hours and days of work boat operation	None	None	
PO1493PC1 - Condition No. 8	Rule 29 Solvent Use	•Maintain a list of exempt solvents •Annual compliance certification	•Maintain a list of exempt solvents	None	None	
PO1493PC1 – Condition No. 9	Rule 26 Temporary ERCs	None	None	None	None	Submit App. by June 28, 2009
PO1493PC2 - Condition Nos. 1 2, and 5	Rule 29 Flare Fuel Consumption	•Flare gas consumption •Identify emergency vs. non-emergency usage •Annual compliance certification	•Monthly records of flare gas consumption	None	None	

1.c.2 Permit-Specific Conditions (Continued)

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
PO1493PC2 - Condition Nos. 3 and 4	Rule 71.1 Flare Ignition System Operation	•Monthly tests of flare's ignition system •Annual compliance certification	•Records of ignition system tests and maintenance activities	None	None	
PO1493PC3 Condition Nos. 1 and 2	Rule 29 Backup Generator Operation	•Annual compliance certification	None	None	None	
PO1493PC4	Rule 29 Out of Service Tanks	•Annual compliance certification including verifying that a tank designated as "Out of Service" is shut down and not being operated	None	None	None	
PO1493PC5	Rules 26, 74.9, and 40 CFR Part 64 (CAM) Engine BACT Emission Limits (NOx, ROC, and CO)	•Annual compliance certification •Biennial source tests (NOx, ROC, and CO) •Air-fuel ratio set point measurements •Quarterly NOx and CO emissions screening •Daily measurement of NOx concentration with portable analyzer	•Quarterly records of the set point measurements •Records of quarterly NOx and CO screenings •Records of inspections •Records of maintenance •Records of daily portable NOx analyzer readings (ppmvd at 15% oxygen), time of measurement, excursions noted	•Actual annual usage •Summary of maintenance and testing •Biennial Source Test Report •Number, duration, and cause of CAM excursions and corrective action taken	•ROC-EPA Method 25 or EPA Method 18 •NO_x-ARB Method 100 •CO-ARB Method 100	
PO1493PC6	Rule 29 Crane Engine Fuel Usage	•Annual compliance certification •Diesel fuel consumption	•Monthly records of diesel fuel consumption	None	None	
PO1493PC7	Rules 26, 35, 74.9, and 40 CFR Part 64 (CAM) Engine BACT Emission Limits	•Annual compliance certification •Biennial source tests (NOx, ROC, and CO) •Quarterly NOx and CO emissions screening •Daily NOx measurement with portable analyzer	•Records of quarterly NOx and CO screenings •Records of daily portable NOx analyzer readings, time of measurement, excursions noted	None	•ROC-EPA Method 25 or EPA Method 18 •NO_x-ARB Method 100 •CO-ARB Method 100	
PO1493PC8	Rules 29 and 71.4 Drain Pit Operation	•Annual compliance certification	None	None	None	Function of the pit is to act as a containment berm.

1.c.3 General Applicable Requirements

The General Applicable Requirements Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 9 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
50	Rule 50	•Routine surveillance •Visual inspections •Annual compliance certification, including a formal survey •Opacity readings upon request •Notification required for uncorrectable visible emissions	•All occurrences of visible emissions for periods>3min in any one hour •Annual formal survey of all emissions units	None	•Opacity - EPA Method 9	
54.B.1 (OCS)	Rule 54.B.1	•Annual compliance certification •Identify planned vs. unplanned flaring event •Identify date, time, duration, flare volume, and estimated sulfur emissions per flare event •Upon request, source test for sulfur compounds at point of discharge	•Representative fuel analysis or exhaust analysis and compliance demonstration •Flare records	None	•Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A,16B, or SCAQMD Method 307-94, as appropriate	
54.B.2 (OCS)	Rule 54.B.2	•Annual compliance certification •Identify planned vs. unplanned flaring event •Identify date, time, duration, flare volume, and estimated sulfur emissions per flare event •Determine ground or sea level concentrations of SO_2, upon request	•Representative fuel analysis or exhaust analysis and modeling data or other compliance demonstration •Flare records	None	•SO_2 - BAAQMD Manual of Procedures, Vol.VI, Section 1, Ground Level Monitoring for H_2S and SO_2	
57.1	Rule 57.1	•Annual compliance certification	None	None	None	•Not required based on District analysis
64.B.1	Rule 64.B.1	•Annual compliance certification •None for PUC-quality gas •Annual test for non PUC-quality gas (submit with annual compliance certification)	•Annual fuel gas analysis for non PUC-quality gas	None	•SCAQMD Method 307-94	
64.B.2	Rule 64.B.2	•Annual compliance certification •Fuel supplier's certification, or fuel test per each delivery (submit with annual compliance certification)	•Fuel supplier's certification, or fuel test per each delivery	None	•ASTM Method D4294-83 or D2622-87	

1c.3 General Applicable Requirements (Continued)

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
71.1.C	Rules 71.1.C and 74.10	•Annual compliance certification •Rule 74.10 inspections •Visual inspection to ensure collection system is closed •Quarterly inspection of flare to ensure proper operation	•Records of inspections of flare •Rule 74.10 records	None	None	Compliance with Rule 74.10 ensures compliance with the gas collection system's maintenance requirements
71.4.B.1	Rule 71.4.B.1	•Annual compliance certification to ensure there are no first stage sumps	None	None	None	
71.4.B.3	Rule 71.4.B.3	•Annual compliance certification •Routine surveillance and visual inspections of well cellars	•Records of maintenance or well workover activity during periods of crude oil storage	None	None	
74.6	Rule 74.6	•Annual compliance certification •Maintain current solvent information •Routine surveillance of solvent cleaning activities •Upon request, solvent testing	•Records of current solvent information	None	•ROC content-EPA Test Method 24 or 24A •Identity of solvent components-ASTM E168-67, ASTM E169-87, or ASTM E260-85 •True vapor pressure or composite partial pressure -ASTM D2879-86 •Initial boiling point-ASTM 1078-78 or published source •Spray gun active/passive solvent losses-SCAQMD Method (10-3-89)	
74.10	Rule 74.10	•Annual compliance certification •Identify leaking components •Inspections every shift or 8 hours at natural gas processing plants •Daily and/or weekly inspections for specified equipment •Quarterly inspections for specified components •Pressure relief valve inspections •Annual update to Operator Management Plan •Notification of major leaks in critical components •Notification of repeat leaks	•Records of leak inspections in inspection log	None	•Gas Leaks - EPA Method 21 •ROC Concentration of Gas Streams - ASTM E168-88, ASTM E169-87, or ASTM E260-85 •Weight percentage of evaporated compounds of liquids – ASTM Method D 86-82 •API Gravity - ASTM Method D287	

1.c.3 General Applicable Requirements (Continued)

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.11.1	Rule 74.11.1	•Annual Compliance Certification •Maintain identification records of large water heaters and small boilers	•Current large water heater and small boiler information	None	None	•Rule only applies to future installation of large water heaters and small boilers
74.22	Rule 74.22	•Annual compliance certification •Maintain furnace identification records	•Records of current furnace information	None	None	•Rule only applies to future installation of natural gas-fired, fan-type furnaces

1.c.4 General Requirements for Short-Term Activities

The General Requirements for Short-Term Activities Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 10 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Semi-annual Reports	Test Methods	Comments
74.1	Rule 74.1	•Annual compliance certification •Routine surveillance and visual inspections of abrasive blasting operation •Abrasive blasting records	•Abrasive blasting records	None	•Visible emission evaluation-Section 92400 of CCR	
74.2	Rule 74.2	•Annual compliance certification •Routine surveillance •Maintain VOC records of coatings used	•Maintain VOC records of coatings used	None	•See Rule 74.2.G for test methods	
74.16	Rule 74.16	•Annual compliance certification to ensure electric power drilling and/or drilling engine has valid APCD Permit to Operate and meets NOx limit •Annual source tests (NOx) or engine manufacturer certification	•Records of source tests or engine manufacturer certification	None	•NOx – ARB Method 100	
40CFR.61.M	40 CFR Part 61, Subpart M	•Annual compliance certification •See 40 CFR Part 61.145 for inspection procedures	•See 40 CFR Part 61.145 for recordkeeping procedures	•See 40 CFR Part 61.145 for notification procedures	•See 40 CFR Part 61.145 for test methods	

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2. PERMITTED EQUIPMENT AND APPLICABLE REQUIREMENTS TABLE

Purpose

The purpose of this table is to list the emissions units at this stationary source that are permitted to operate pursuant to Rule 10, "Permits Required" and Rule 23, "Exemptions From Permit". The table also provides a list of requirements that are specifically applicable to these emissions units. Permit conditions that enforce these requirements are listed in Section No. 7, "Specific Applicable Requirements" and Section No. 8, "Permit Specific Conditions" of this permit.

In addition to the emission unit specific requirements in Section No. 7 and Section No. 8, there are additional general requirements that may apply to the emissions units listed in this table, or to the stationary source as a whole. Furthermore, some general requirements may apply to emissions units or short-term activities not required to be specifically listed on the permit. These general requirements are contained in the following sections of the Permit: Section No. 9, "General Applicable Requirements"; Section No. 10, "General Requirements for Short-Term Activities"; Section No. 11, "General Permit Conditions"; and Section No. 12, "Miscellaneous Federal Program Conditions".

Equipment Description

This portion of the table provides a brief description of the permitted equipment at this stationary source. Attached to the table is a "Title V Equipment List Description Key" that contains definitions and explanations for some of the standard terminology used in the equipment description.

Applicable Requirements

The applicable requirements portion of the table is a matrix of applicability for the specific requirements that apply to the listed emissions units. The columns are labeled with APCD rule numbers or references to federal requirements. An "X" in the row corresponding to the emissions unit indicates the requirement is specifically applicable to that unit. For cases where a rule has multiple compliance options, a number appears instead of an "X". The number is a code key that corresponds to the "Title V Applicable Requirement Code Key" attached to the table. The code key table contains specific citations for the portions of the rule that are applicable. The code key is also used to identify the permit attachment in Section No. 7, "Specific Applicable Requirements," that contains the associated permit conditions. For example, code key "1" under Rule 71.1 is associated with Attachment 71.1N1 in Section No. 7.

Permit specific conditions are identified with a "PC" followed by a number in the column labeled "ADD REQ" (additional requirements). A "PC#" in the row corresponding to the emissions unit indicates that the permit specific condition is specifically applicable to that unit. The "PC#" also

corresponds to the permit attachment in Section No. 8, "Permit Specific Conditions", that contains the permit specific requirements.

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TABLE NO. 2

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Permit to Operate No. 01493
Permitted Equipment and Applicable Requirements

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Equipment	71.1	71.4	74.9	Engine ATCM	RICE MACT	Additional Requirements
Platform Grace						
1 - 321 BBL PWT (Waste Water Pump Tank) (T-24) VR	1					
1 - 300 BBL COST ("Dirty" Oil) (T-3A) VR	1					PC1
1 - 300 BBL COST ("Dirty" Oil) (T-3B) VR	1					PC1
1 - 300 BBL Oil Pipeline Relief Tank (T-11) VR	1					
1 - 200 BBL COST (Production Surge Vessel) (V-8) VR	1					PC1
1 - 100 BBL Spare COST (T-10) VR **						PC4
1 - 80 BBL PWT (Waste Water Sump Tank) (T-12) VR	1					
1 - 50 BBL Production Drain Tank (T-9) VR	1					
1 - 180 Sqft Waste Water Sump (T-13) Exempt < 5 mg/l		3				
1 - 33.57 Sqft Waste Water CPI Sump (T-2) Exempt < 5 mg/l		3				
1 - 7.07 Sqft Deck Drain Pit - Containment Berm - Exempt						PC8
1 - 773 BHP NG Rich Burn Waukesha Engine (G-03) NSCR			3		7	PC1, PC5
1 - 600 BHP Caterpillar Diesel Back-up Generator Engine (G-02)			8	3	3	PC1, PC3
3 - 915 BHP (650 kW) Caterpillar Rich Burn Natural Gas Engines, Model G-399 SI-TA HCR, NSCR, Turbocharger, Aftercooler, Electricity Generating Engines (G-6A, G-6B, G-6C)			3		7	PC7
2 - 915 BHP (650 kW) Caterpillar Rich Burn Natural Gas Engines, Model G-399 SI-TA HCR, NSCR, Turbocharger, Aftercooler, Electricity Generating Engines (G-1A, G-1B)			3		7	PC7
1 - 300 BHP Diesel Engine No. 1 (GM Model 8V92) (North Crane)			9	3	4	PC1, PC6
1 - 300 BHP Diesel Engine No. 2 (GM Model 8V92) (South Crane)			9	3	4	PC1, PC6
1 - 1006.30 MMBTU/Hr Kaldair Indair Flare, (High Pressure) Model I-15-H-VS, equipped with a Tulip/Coanda tip and two John Zink KEP-100 pilots with auto-ignition systems (installed 1994)						PC2
1 - 218.8 MMBTU/Hr Kaldair Flare (Low Pressure), Model PLA-20 Air-assisted, equipped with two John Zink KEP-100 pilots with auto-ignition systems (installed 1994)						PC2
1 - 120 BHP Detroit Diesel Emergency Engine, Model 500 Diesel, Serial No. 78-1804-1, I.D. P-19, used for fire suppression purposes			7	3	3	PC1
1 - 198 BBL Slurry Tank UNC (T-23) **						PC4
Boom Boat (Boomer)						
2 - 200 BHP Diesel Main Engines (Volvo Penta, Model AQAD41A)						PC1
Crew Boat Engines						
Glenn C						
4 - 510 BHP Diesel Main Engines (Detroit 12V71TI)						PC1
2 - 124 BHP Diesel Generator Engines (Detroit 4-71N)						PC1
Doug C						
3 - 535 BHP Diesel Main Engines (Detroit 6062)						PC1
2 - 50.5 BHP Diesel Generator Engines (Lugger L984)						PC1
Jackie C						
4 - 510 BHP Diesel Main Engines (Detroit 12V71TI)						PC1
2 - 65 BHP Diesel Generator Engines (Detroit 3-71)						PC1
1- 89 BHP Diesel Fire Water Pump Engine (Detroit 4-71)						PC1
Aces Wild						
3 - 510 BHP Diesel Main Engines (Detroit 12V71TI)						PC1
2 - 65 BHP Diesel Generator Engines (Detroit 3-71)						PC1
Ryan T						
4 - 567 BHP Diesel Main Engines (Scania DI16)						PC1
2 - 40 BHP Diesel Generator Engines (Northern Light M30CW3.2)						PC1
Robbie Tide						
3 - 510 BHP Diesel Main Engines (Detroit 12V71TI)						PC1
2 - 75 BHP Diesel Generator Engines (Detroit 3-71)						PC1
Patrick						
3 - 510 BHP Diesel Main Engines (Detroit 12V71TI)						PC1
2 - 75 BHP Diesel Generator Engines (Detroit 3-71)						PC1
Danny C						
2 - 365 BHP Diesel Main Engines (Caterpillar 3406 C)						PC1
1 - 40 BHP Diesel Generator Engine (Isuzu 4JB1)						PC1
1 - 32 BHP Diesel Generator Engine (Northern Lights M20)						PC1
1 - 46 BHP Diesel Hydraulic Engine (Detroit 271)						PC1
Ace High						
2 - 650 BHP Diesel Main Engines (Detroit 12V92TI)						PC1
1 - 510 BHP Diesel Main Center Engine (Detroit 12V71TI)						PC1

TABLE NO. 2

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Permit to Operate No. 01493
Permitted Equipment and Applicable Requirements

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Equipment	71.1	71.4	74.9	Engine ATCM	RICE MACT	Additional Requirements
2 - 65 BHP Diesel Generator Engines (Detroit 3-71)						PC1
Work Boat Engines						
San Miguel						
2 - 2000 BHP Diesel Main Engines (Caterpillar 3516B DITA SCAC)						PC1
2 - 247 BHP Diesel Generator Engines (Caterpillar 3306 DIT)						PC1
1 - 550 BHP Diesel Thruster Engine (Caterpillar 3408 DITA)						PC1
1 - 315 BHP Diesel Compressor Engine (Caterpillar 3306 DITA)						PC1
1 - 306 BHP Diesel Aux Pump Engine (Caterpillar 3406 DIT)						PC1
1 - 273 BHP Diesel Winch Engine (Detroit 8V-71)						PC1
O'Neil Tide						
2 - 1125 BHP Diesel Main Engines (Caterpillar D399T/A)						PC1
2 - 243 BHP Diesel Generator Engines (Caterpillar 3306 DIT)						PC1
1 - 325 BHP Diesel Thruster Engine (Caterpillar 3406 DIT)						PC1
1 - 325 BHP Diesel Aux Fire Pump Engine (Caterpillar 3406 DIT)						PC1
2 - 243 BHP Diesel Aux Liquid Pump Engines (Caterpillar 3306 DIT)						PC1
Victory Seahorse						
2 - 2500 BHP Diesel Main Engines (EMD 16-645-ED3A)						PC1
2 - 200 BHP Diesel Generator Engines (Detroit 8V-71)						PC1
1 - 300 BHP Diesel Thruster Engine (Detroit 8V-71)						PC1
Santa Cruz						
2 - 2000 BHP Diesel Main Engines (Caterpillar 3516B)						PC1
2 - 245 BHP Diesel Generator Engines (Caterpillar 3306)						PC1
1 - 515 BHP Diesel Thruster Engine (Caterpillar 3408)						PC1
Toby Tide						
2 - 1125 BHP Diesel Main Engines (Caterpillar D399TA)						PC1
2 - 200 BHP Diesel Generator Engines (Detroit 8V-71)						PC1
1 - 300 BHP Diesel Thruster Engine (Detroit 8V-71)						PC1
Sea Tide						
2 - 1220 BHP Diesel Main Engines (DDEC 12V149TI)						PC1
2 - 200 BHP Diesel Generator Engines (Detroit 8V-71)						PC1
1 - 200 BHP Diesel Thruster Engine (Detroit 6V-71)						PC1
Robin J						
2 - 600 BHP Diesel Main Engines (GM 1692)						PC1
2 - 21 BHP Diesel Generator Engines (GM 471)						PC1
Jackie C						
4 - 510 BHP Diesel Main Engines (Detroit 12V71TI)						PC1
2 - 65 BHP Diesel Generator Engines (Detroit 3-71)						PC1
1- 89 BHP Diesel Fire Water Pump Engine (Detroit 4-71)						PC1
Patriot II						
2 - 626 BHP Diesel Main Engines (Detroit 16V92)						PC1
2 - 103 BHP Diesel Generator Engines (Detroit 4-71)						PC1
1 - 103 BHP Diesel Fire Pump Engine (Detroit 4-71)						PC1
Kenneth Carl						
2 - 620 BHP Diesel Main Engines (Detroit 16V92)						PC1
2 - 76 BHP Diesel Generator Engines (Detroit 3-71)						PC1
1 - 103 BHP Diesel Fire Pump Engine (Detroit 4-71)						PC1
Glenn C						
4 - 510 BHP Diesel Main Engines (Detroit 12V71TI)						PC1
2 - 124 BHP Diesel Generator Engines (Detroit 4-71N)						PC1
Doug C						
3 - 535 BHP Diesel Main Engines (Detroit 6062)						PC1
2 - 50.5 BHP Diesel Generator Engines (Lugger L984)						PC1
Patrick						
3 - 510 BHP Diesel Main Engines (Detroit 12V71TI)						PC1
2 - 75 BHP Diesel Generator Engines (Detroit 3-71)						PC1
For Use Throughout Leases						
16 - Oil Wells (11 active wells)						PC1
Exempt Equipment						
Wipe Cleaning Operation						
** - Out of Service						

TITLE V EQUIPMENT LIST DESCRIPTION KEY

For Title V permits, the Permitted Equipment and Applicable Requirements Table contains a number of terms, abbreviations, and acronyms that have been standardized for oilfield facilities. The following list describes many of the terms on an oilfield equipment list:

BHP The output of an internal combustion engine as measured in brake horsepower.

BL A crude oil loading facility that is equipped with bottom loading capabilities.

Condensate Tank A tank that is used for the purpose of storing water and hydrocarbon liquids recovered from natural gas scrubbers. This tank is assumed to operate with a variable liquid level and has an associated throughput limit.

COST A crude oil storage tank that generally operates with a variable liquid level and has an associated throughput limit. An oil shipping tank that has a truck loading rack is a COST by definition. These tanks may also be known as shipping tanks.

Cover Indicates that a petroleum sump, pit, or pond is equipped with a properly installed and maintained cover which complies with Rule 71.4.

EXEMPT A tank, pit, or sump that processes produced water with an ROC content of less than 5 milligrams per liter and is exempt from Rule 71.1 or Rule 71.4.

Gauge or Test Tank A tank that is used for the purpose of production testing a well or group of wells. This tank is assumed to operate with a variable liquid level and has an associated throughput limit.

LACT Tank A Lease Automated Custody Transfer tank that operates at a constant or near constant liquid level and does not have an associated throughput limit. This tank is generally equipped with a LACT pump for pipeline oil shipping. A shipping tank with a truck loading rack is not by definition a LACT tank, but is a COST.

Loading Facility A crude oil loading rack or loading valve used for the transfer of crude oil from a storage tank or group of tanks to a delivery vessel.

Lo-NOx Device has equipment to control the emissions of NOx and CO to meet the requirements of Rules 74.15 or 74.15.1, or best available control technology requirements.

MMBTU/Hr The heat input of an external combustion device as measured in millions of British Thermal Units per hour.

NG Indicates that the equipment is permitted to be fired on natural gas only.

NG/FO Indicates that equipment is permitted to be fired on natural gas with fuel oil or diesel as a backup fuel.

NSCR Engine that is equipped with non-selective catalytic reduction to meet its Rule 74.9 compliance requirements.

Pit Device used to receive emergency or intermittent flows.

PSC Engine that is equipped with a pre-stratified charge to meet its Rule 74.9 compliance requirements.

PWT A produced water tank that generally operates with a constant liquid level and does not have an associated throughput limit. These tanks may also be known as free water knock out (FWKO) tanks.

Rich Burn or Lean Burn A designation associated with a gas-fired internal combustion engine that determines its Rule 74.9 compliance requirements.

SCR Engine or turbine that is equipped with selective catalytic reduction and ammonia injection to meet its Rule 74.9 or Rule 74.23 compliance requirements.

SF A crude oil loading facility that is equipped with submerged fill loading capabilities.

Sump Device used for separation, generally in constant use.

UNC Indicates that the equipment is uncontrolled. For example, a tank that is not equipped with a vapor recovery system, or an engine or heater that is not equipped with NOx controls are labeled UNC.

VR A vapor recovery system that is installed on a tank, loading rack or loading facility, glycol dehydrator, or other piece of process equipment.

Wash Tank A tank that stores and separates oil and water that generally operates with a constant liquid level. It does not have an associated throughput limit.

TITLE V APPLICABLE REQUIREMENT CODE KEY

Rule 71.1, "Crude Oil Production and Separation"

1. Storage tanks shall be equipped with a vapor recovery system that directs all vapors to a gas gathering system or flare (71.1.B.1.a)
2. Storage tanks shall be equipped with a vapor recovery system that directs all vapors to some other control system with a minimum destruction or removal efficiency of 90% by weight (71.1.B.1.b)
3. Tank batteries installed prior to June 20, 1978 are exempt from vapor recovery when processing crude oil having a modified Reid vapor pressure of less than 0.5 psia. Solid roof and pressure-vacuum relief valve is required. (71.1.B.2/71.1.D.1.a)
4. Storage tanks are exempt from the solid roof and vapor recovery requirements if the ROC content of the liquid entering the tank is less than 5 milligrams per liter. (71.1.D.3)
5. Storage tanks are exempt from the solid roof and vapor recovery requirements if a BACT Cost Analysis indicates that maximum emission reduction has already taken place. (71.1.D.4)
6. Portable tanks shall be equipped with closed covers and pressure vacuum valves and have limited exemptions from vapor recovery requirements. (71.1.B.3/71.1.D.1.c)

Rule 71.4, "Petroleum Sumps, Pits, Ponds and Well Cellars"

1. Second and third stage sumps, pits, and ponds shall have an impermeable cover (71.4.B.2)
2. Exemption from cover requirement for emergency pits (71.4.C.1.b)
3. Exemption from cover requirement for sumps, pits, or pond if the ROC content of the liquid at the point of entry is less than 5 milligrams per liter (71.4.C.1.c)
4. Exemption from cover requirement for sumps, pits, or pond when a BACT Cost Analysis indicates that maximum emission reduction has already taken place. (71.4.C.1.d)

Rule 74.9, "Stationary Internal Combustion Engines"

1. Pre-January 1, 2002 emissions limits for rich-burn engines (increments of progress have passed)
2. Pre-January 1, 2002 emissions limits for lean-burn engines (increments of progress have passed)
3. Natural gas-fired rich-burn engines (74.9.B.1 or 74.9.B.2)
4. Natural gas-fired lean-burn engines (74.9.B.1 or 74.9.B.2) with ammonia emission limit, if applicable. (74.9.B.5)
5. Diesel engines. (74.9.B.1 or 74.9.B.2) with ammonia emission limit, if applicable. (74.9.B.5)
6. Exemption from Rule 74.9 for engines operated less than 200 hours per calendar year (74.9.D.2)
7. Exemption from Rule 74.9 for emergency standby engines operated during either an emergency or maintenance operation. (74.9.D.3)

8. Exemption from Rule 74.9 for diesel engines with a permitted capacity factor of less than or equal to 15%. (74.9.D.8)
9. Exemption from Rule 74.9 for diesel engines used to power cranes and welding equipment. (74.9.D.9)

Section 93115, Title 17, California Code of Regulations California Airborne Toxic Control Measure For Stationary Compression Ignition (CI) Engines

1. In-use emergency fire pump assembly engines
2. In-use emergency engines operated not more than 20 hours per year for maintenance and testing purposes.
3. Engines operated solely on OCS Platforms.

40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engine (RICE MACT)

1. Existing compression ignition and spark ignition engine compliance dates
2. Existing landfill gas engines – area source
3. Existing emergency diesel engines – area source
4. Existing non-emergency diesel engines $\leq$ 300 HP – area source
5. Existing non-emergency diesel engines 300 HP $<$ X $\leq$ 500 HP – area source
6. Existing non-emergency diesel engines $<$ 500 HP – area source
7. Existing non-emergency spark-ignited four stroke remote rich burn engine $>$ 500 HP – area source

3. PERMITTED THROUGHPUT AND CONSUMPTION LIMIT TABLE

Purpose

The purpose of this table is to list the emissions units at this stationary source that have limitations on throughput, fuel consumption, raw material usage, hours of operation, or other parameters that limit the potential to emit of the emissions unit. In some cases, the limit on the potential to emit is expressed directly as a set of pollutants and emission limits in tons per year.

These limitations are applied pursuant to Rule 26, "New Source Review" or Rule 29, "Conditions on Permits". Two sets of limits are listed in this table. The "Throughput Permit Limit" is the enforceable limit pursuant to this permit. Permit conditions that enforce these limits are listed in Section No. 8, "Permit Specific Conditions" of this permit.

The "Calculation Throughput" is used only to calculate permitted emissions pursuant to Rule 29, "Conditions on Permits".

Equipment Description

This portion of the table is the same as the equipment description in the "Permitted Equipment and Applicable Requirements Table".

Throughput Permit Limit

The throughput or consumption limit listed in this column of the table is an enforceable limit on the emissions unit's potential to emit. In the column labeled "District (D)/ Federal (F) Enforceable", a "D" or an "F" denotes whether the limit is only enforceable by the District or whether the limit is a federally-enforceable limit. District-enforceable limits are limits applied solely pursuant to Rule 29, "Conditions on Permits". Limits that have been applied pursuant to Rule 26, "New Source Review" are federally enforceable.

The throughput permit limit may apply to a single emissions unit or to a set of emission units. When the limit applies to set of emissions units, the set consists of the emissions unit with which the limit is listed and the emissions units which follow that have an asterisk in the throughput permit limit column.

Pursuant to Rule 26 and Rule 29, the throughput permit limit is an annual limit which is enforceable based on a period of any twelve (12) consecutive calendar months.

Note that when the calculation throughput (discussed below) corresponds to using the emissions unit full time (8760 hours per year) at maximum rated capacity, the throughput permit limit column contains the notation "No Limit". When District emission calculation procedures do not involve throughput or consumption data, both the throughput permit limit and the calculation throughput

column are left blank.

Calculation Throughput

The throughput or consumption limit listed in this column of the table is the throughput used in the District calculation procedures to calculate permitted emissions for the emissions unit. The calculation throughput may apply to a single emissions unit or to a set of emissions units denoted as discussed above. The calculation throughput is not an enforceable permit limit.

The "Calculation Procedure" column is reserved for future use. Emission calculations for the emissions units in this table are available in the District's permit files for this stationary source.

Abbreviations

The following abbreviations have been used in the "Permitted Throughput and Consumption Limit Table" for the "Throughput Permit Limit" column and for the "Calculation Throughput Limit" column:

BBL/Yr: barrels per year
Days/Yr: days per year
FO: fuel oil or diesel fuel
Gal/Yr: gallons per year
Hrs/Day: hours per day
Hrs/Yr: hours per year
Lbs ROC/Yr: pounds of reactive organic compounds per year
LPG: liquid petroleum gas (propane)
MBBL/Yr: thousands of barrels per year
MGal/Yr: thousands of gallons per year
MMBTU/Yr: million British Thermal Units of heat input per year
MMCF/Yr: million standard cubic feet of natural gas per year
MMGal/Yr: million gallons per year
NG: natural gas
TPY: tons per year

TABLE NO. 3

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Permit to Operate No. 01493
Permitted Throughput/Consumption Limits

M:\TITLEV\TV Permits\PO1493\PERMITIV\TABLES_REV421.xls Equipment	Throughput/Emissions Permit Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput	Calculation Procedure
Platform Grace				
1 - 321 BBL PWT (Waste Water Pump Tank) (T-24) VR				
1 - 300 BBL COST ("Dirty" Oil) (T-3A) VR	20 MBBL/Yr	F	20 MBBL/Yr	
1 - 300 BBL COST ("Dirty" Oil) (T-3B) VR	20 MBBL/Yr	F	20 MBBL/Yr	
1 - 300 BBL Oil Pipeline Relief Tank (T-11) VR				
1 - 200 BBL COST (Production Surge Vessel) (V-8) VR	3,960 MBBL/Yr	F	3,960 MBBL/Yr	
1 - 100 BBL Spare COST (T-10) VR **				
1 - 80 BBL PWT (Waste Water Sump Tank) (T-12) VR				
1 - 50 BBL Production Drain Tank (T-9) VR				
1 - 180 Sqft Waste Water Sump (T-13) Exempt < 5 mg/l				
1 - 33.57 Sqft Waste Water CPI Sump (T-2) Exempt < 5 mg/l				
1 - 7.07 Sqft Deck Drain Pit - Containment Berm - Exempt				
1 - 773 BHP NG Rich Burn Waukesha Engine (G-03) NSCR	51.10 MMCF/Yr NG	F	51.1 MMCF/Yr NG	
1 - 600 BHP Caterpillar Diesel Back-up Generator Engine (G-02)	55.9 MGal/Yr	F	55.9 MGal/Yr	
3 - 915 BHP (650 kW) Caterpillar Rich Burn Natural Gas Engines, Model G-399 SI-TA HCR, NSCR, Turbocharger, Aftercooler, Electrictiy Generatng Engines (G-6A, G-6B, G-6C)	60.00 MMCF/Yr NG	F	60.00 MMCF/Yr NG	
2 - 915 BHP (650 kW) Caterpillar Rich Burn Natural Gas Engines, Model G-399 SI-TA HCR, NSCR, Turbocharger, Aftercooler, Electricity Generating Engines (G-1A, G-1B)	126.72 MMCF/Yr NG	F	126.72 MMCF/Yr NG	
1 - 300 BHP Diesel Engine No 1 (GM Model 8V92) (North Crane)	13,344 Gal/Yr ++	F	13,344 Gal/Yr ++	
1 - 300 BHP Diesel Engine No 2 (GM Model 8V92) (South Crane)	*	F	*	
1 - 1006.30 MMBTU/Hr Kaldair Indair Flare, (High Pressure) Model I-15-H-VS, equipped with a Tulip/Coanda tip and two John Zink KEP-100 pilots with auto-ignition systems (installed 1994)	12.50 MMCF/Yr	F	12.50 MMCF/Yr	
1 - 218.8 MMBTU/Hr Kaldair Flare (Low Pressure), Model PLA-20 Air-assisted, equipped with two John Zink KEP-100 pilots with auto-ignition systems (installed 1994)	*	F	*	
1 - 120 BHP Detroit Diesel Emergency Engine, Model 500 Diesel, Serial No 78-1804-1, I.D. P-19, used for fire suppression purposes	50 Hr/Yr ***	D	50 Hr/Yr	
1 - 198 BBL Slurry Tank UNC (T-23) **				
Boom Boat (Boomer)				
2 - 200 BHP Diesel Main Engines (Volvo Penta, Model AQAD41A)	469 Gal/Yr	F	469 Gal/Yr	
Crew Boat Engines				
Glenn C			35.392 Mgal/Yr	
4 - 510 BHP Diesel Main Engines (Detroit 12V71TI)				
2 - 124 BHP Diesel Generator Engines (Detroit 4-71N)				
ROC	1.61 TPY	F		
NOx	27.15 TPY	F		
PM	1.62 TPY	F		
SOx	0.36 TPY	F		
CO	4.93 TPY	F		
Doug C				
3 - 535 BHP Diesel Main Engines (Detroit 6062)	*	F	*	
2 - 50.5 BHP Diesel Generator Engines (Lugger L984)	*	F	*	
Jackie C				
4 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	*	F	*	
2 - 65 BHP Diesel Generator Engines (Detroit 3-71)	*	F	*	
1- 89 BHP Diesel Fire Water Pump Engine (Detroit 4-71)	*	F	*	
Aces Wild				
3 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	*	F	*	
2 - 65 BHP Diesel Generator Engines (Detroit 3-71)	*	F	*	
Ryan T				
4 - 567 BHP Diesel Main Engines (Scania DI16)	*	F	*	
2 - 40 BHP Diesel Generator Engines (Northern Light M30CW3.2)	*	F	*	
Robbie Tide				
3 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	*	F	*	
2 - 75 BHP Diesel Generator Engines (Detroit 3-71)	*	F	*	
Patrick				
3 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	*	F	*	
2 - 75 BHP Diesel Generator Engines (Detroit 3-71)	*	F	*	
Danny C				
2 - 365 BHP Diesel Main Engines (Caterpillar 3406 C)	*	F	*	
1 - 40 BHP Diesel Generator Engine (Isuzu 4JB1)	*	F	*	
1 - 32 BHP Diesel Generator Engine (Northern Lights M20)	*	F	*	
1 - 46 BHP Diesel Hydraulic Engine (Detroit 271)	*	F	*	
Ace High				
2 - 650 BHP Diesel Main Engines (Detroit 12V92TI)	*	F	*	
1 - 510 BHP Diesel Main Center Engine (Detroit 12V71TI)	*	F	*	
2 - 65 BHP Diesel Generator Engines (Detroit 3-71)	*	F	*	

TABLE NO. 3

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Permit to Operate No. 01493
Permitted Throughput/Consumption Limits

M:\TITLEV\TV Permits\PO1493\PERMITIV\TABLES_REV421.xls Equipment	Throughput/Emissions Permit Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput	Calculation Procedure
Work Boat Engines				
San Miguel			61 4 MGal/Yr	
2 - 2000 BHP Diesel Main Engines (Caterpillar 3516B DITA SCAC)	*	F	*	
2 - 247 BHP Diesel Generator Engines (Caterpillar 3306 DIT)	*	F	*	
1 - 550 BHP Diesel Thruster Engine (Caterpillar 3408 DITA)	*	F	*	
1 - 315 BHP Diesel Compressor Engine (Caterpillar 3306 DITA)	*	F	*	
1 - 306 BHP Diesel Aux Pump Engine (Caterpillar 3406 DIT)	*	F	*	
1 - 273 BHP Diesel Winch Engine (Detroit 8V-71)	*	F	*	
O'Neil Tide				
2 - 1125 BHP Diesel Main Engines (Caterpillar D399T/A)	*	F	*	
2 - 243 BHP Diesel Generator Engines (Caterpillar 3306 DIT)	*	F	*	
1 - 325 BHP Diesel Thruster Engine (Caterpillar 3406 DIT)	*	F	*	
1 - 325 BHP Diesel Aux Fire Pump Engine (Caterpillar 3406 DIT)	*	F	*	
2 - 243 BHP Diesel Aux Liquid Pump Engines (Caterpillar 3306 DIT)	*	F	*	
Victory Seahorse				
2 - 2500 BHP Diesel Main Engines (EMD 16-645-ED3A)	*	F	*	
2 - 200 BHP Diesel Generator Engines (Detroit 8V-71)	*	F	*	
1 - 300 BHP Diesel Thruster Engine (Detroit 8V-71)	*	F	*	
Santa Cruz				
2 - 2000 BHP Diesel Main Engines (Caterpillar 3516B)	*	F	*	
2 - 245 BHP Diesel Generator Engines (Caterpillar 3306)	*	F	*	
1 - 515 BHP Diesel Thruster Engine (Caterpillar 3408)	*	F	*	
Toby Tide				
2 - 1125 BHP Diesel Main Engines (Caterpillar D399TA)	*	F	*	
2 - 200 BHP Diesel Generator Engines (Detroit 8V-71)	*	F	*	
1 - 300 BHP Diesel Thruster Engine (Detroit 8V-71)	*	F	*	
Sea Tide				
2 - 1220 BHP Diesel Main Engines (DDEC 12V149TI)	*	F	*	
2 - 200 BHP Diesel Generator Engines (Detroit 8V-71)	*	F	*	
1 - 200 BHP Diesel Thruster Engine (Detroit 6V-71)	*	F	*	
Robin J				
2 - 600 BHP Diesel Main Engines (GM 1692)	*	F	*	
2 - 21 BHP Diesel Generator Engines (GM 471)	*	F	*	
Jackie C				
4 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	*	F	*	
2 - 65 BHP Diesel Generator Engines (Detroit 3-71)	*	F	*	
1- 89 BHP Diesel Fire Water Pump Engine (Detroit 4-71)	*	F	*	
Patriot II				
2 - 626 BHP Diesel Main Engines (Detroit 16V92)	*	F	*	
2 - 103 BHP Diesel Generator Engines (Detroit 4-71)	*	F	*	
1 - 103 BHP Diesel Fire Pump Engine (Detroit 4-71)	*	F	*	
Kenneth Carl				
2 - 620 BHP Diesel Main Engines (Detroit 16V92)	*	F	*	
2 - 76 BHP Diesel Generator Engines (Detroit 3-71)	*	F	*	
1 - 103 BHP Diesel Fire Pump Engine (Detroit 4-71)	*	F	*	
Glenn C				
4 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	*	F	*	
2 - 124 BHP Diesel Generator Engines (Detroit 4-71N)	*	F	*	
Doug C				
3 - 535 BHP Diesel Main Engines (Detroit 6062)	*	F	*	
2 - 50.5 BHP Diesel Generator Engines (Lugger L984)	*	F	*	
Patrick				
3 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	*	F	*	
2 - 75 BHP Diesel Generator Engines (Detroit 3-71)	*	F	*	
For Use Throughout Leases				
16 - Oil Wells (11 active wells)				
Exempt Equipment				
Wipe Cleaning Operation				

* - Included in Limit Above
++ - Crane Engine Limit w/ Active Wells is 7,344 Gal/Yr
** - Out of Service
*** - 50 Hr/Yr limitation is for maintenance of the engine. Emergency use is unlimited.

4. PERMITTED EMISSIONS TABLE

Purpose

The purpose of this table is to document the permitted emissions for this stationary source. Rule 29, "Conditions on Permits", requires permitted emissions to be included on each Permit to Operate. Rule 29 is federally enforceable on OCS Platforms, pursuant to 40 CFR Part 55, "Outer Continental Shelf Air Regulations".

The permitted emissions table also characterizes the amount and type of criteria air pollutants emitted by this stationary source.

Rule 29 requires that annual permitted emissions be based on a 12 calendar month rolling period and be expressed in units of tons per year. Hourly permitted emissions are required to be expressed in units of pounds per hour. Permitted emissions for a stationary source are required to be determined by aggregating the permitted emissions for each emissions unit at the stationary source.

In general, permitted emissions are calculated based on throughput or consumption data for an emission unit, specific physical characteristics of the emission unit, and emission factors. The emission factors may be standard published emission factors or they may be derived from source test data or specific emission limits that apply to the emissions unit. In some cases, permitted emissions are expressed directly as a set of pollutants and emission limits in tons per year without reference to any calculation method.

Section No. 3, "Permitted Throughput and Consumption Limit Table", contains information on the throughput and consumption limits that are enforceable at this stationary source. In addition, other sections of this permit contain conditions that act to enforce specific portions of the permitted emissions table.

Equipment Description

This portion of the table is the same as the equipment description in the "Permitted Equipment and Applicable Requirements Table".

Tons Per Year

This column of the table represents the permitted emissions in units of tons per year for ROC (reactive organic compounds), NOx (nitrogen oxides), PM (particulate matter), SOx (sulfur oxides), and CO (carbon monoxide). In some cases, emissions of non-criteria pollutants of interest may also be listed. Pursuant to Rule 29, annual permitted emissions shall be the annual emissions used to determine compliance for issuance of any new or revised permit issued after October 22, 1991. For emissions units for which no new or revised permit has been issued since

October 22, 1991, annual permitted emissions generally reflect actual historical emissions from the emissions unit.

The permitted emissions limit may apply to a single emissions unit or to a set of emission units. When the limit applies to set of emissions units, the set consists of the emissions unit with which the limit is listed and the emissions units which follow that have an asterisk in the pollutant columns.

Pounds Per Hour

This column of the table represents the permitted emissions in units of pounds per hour for ROC (reactive organic compounds), NOx (nitrogen oxides), PM (particulate matter), SOx (sulfur oxides), and CO (carbon monoxide). Pursuant to Rule 29, hourly permitted emissions shall be calculated based on the maximum quantity of each air pollutant which may be emitted from the emissions unit during a one hour period, as limited by any applicable rules or permit conditions.

Hazardous Air Pollutants

This permit does not provide information that characterizes the emissions of hazardous air pollutants (HAPS) from this facility. This information can be obtained from the reissuance application or the facility's AB-2588, Air Toxics "Hot Spots", Report referenced at the bottom of the "Permitted Emissions Table". For Outer Continental Source (OCS) sources, not subject to AB-2588, HAP emissions information is included in the permit reissuance application and is maintained by the stationary source.

TABLE NO. 4

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Permit to Operate No. 01493
Permitted Emissions

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Equipment	TONS PER YEAR					POUNDS PER HOUR				
	ROC	NOx	PM	SOx	CO	ROC	NOx	PM	SOx	CO
Platform Grace										
1 - 321 BBL PWT (Waste Water Pump Tank) (T-24) VR	0.01					<0.01				
1 - 300 BBL COST ("Dirty" Oil) (T-3A) VR	0.02					<0.01				
1 - 300 BBL COST ("Dirty" Oil) (T-3B) VR	0.02					<0.01				
1 - 300 BBL Oil Pipeline Relief Tank (T-11) VR	0.01					<0.01				
1 - 200 BBL COST (Production Surge Vessel) (V-8) VR	4.86					1.11				
1 - 100 BBL Spare COST (T-10) VR **	<0.01					<0.01				
1 - 80 BBL PWT (Waste Water Sump Tank) (T-12) VR	<0.01					<0.01				
1 - 50 BBL Production Drain Tank (T-9) VR	<0.01					<0.01				
1 - 180 Sqft Waste Water Sump (T-13) Exempt < 5 mg/l	<0.01					<0.01				
1 - 33.57 Sqft Waste Water CPI Sump (T-2) Exempt < 5 mg/l	<0.01					<0.01				
1 - 7.07 Sqft Deck Drain Pit - Containment Berm - Exempt										
1 - 773 BHP NG Rich Burn Waukesha Engine (G-03) NSCR	1.72	0.89	0.26	0.02	96.15	0.39	0.20	0.06	0.00	21.83
1 - 600 BHP Caterpillar Diesel Back-up Generator Engine (G-02)	0.93	13.11	0.94	0.21	2.85	1.41	19.98	1.43	0.32	4.35
3 - 915 BHP (650 kW) Caterpillar Rich Burn Natural Gas Engines, Model G-399 SI-TA HCR, NSCR, Turbocharger, Aftercooler, Electricity Generating Engines (G-6A, G-6B, G-6C)	0.57	0.58	0.3	0.02	5.02	0.41	0.42	0.22	0.01	3.61
2 - 915 BHP (650 kW) Caterpillar Rich Burn Natural Gas Engines, Model G-399 SI-TA HCR, NSCR, Turbocharger, Aftercooler, Electricity Generating Engines (G-1A, G-1B)	1.19	1.23	0.63	0.04	10.59	0.27	0.28	0.14	0.01	2.41
1 - 300 BHP Diesel Engine No. 1 (GM Model 8V92) (North Crane)	0.22	3.12	0.22	0.05	0.68	1.41	19.98	1.43	0.32	4.35
1 - 300 BHP Diesel Engine No. 2 (GM Model 8V92) (South Crane)	*	*	*	*	*	*	*	*	*	*
1 - 1006.30 MMBTU/Hr Kaldair Indair Flare, (High Pressure) Model I-15-H-VS, equipped with a Tulip/Coanda tip and two John Zink KEP-100 pilots with auto-ignition systems (installed 1994)	0.34	0.45	0.03	2.07	2.43	52.14	68.43	5.03	316.99	372.34
1 - 218.8 MMBTU/Hr Kaldair Flare (Low Pressure), Model PLA-20 Air-assisted, equipped with two John Zink KEP-100 pilots with auto-ignition systems (installed 1994)	*	*	*	*	*	11.34	14.88	1.09	68.93	80.96
1 - 120 BHP Detroit Diesel Emergency Engine, Model 500 Diesel, Serial No. 78-1804-1, I.D. P-19, used for fire suppression purposes	0.01	0.10	0.01	0.00	0.02	0.07	1.00	0.07	0.02	0.22
1 - 198 BBL Slurry Tank UNC (T-23) **										
Boom Boat (Boomer)										
2 - 200 BHP Diesel Main Engines (Volvo Penta, Model AQAD41A)	0.01	0.11	0.01	0.00	0.02	0.94	13.32	0.95	0.21	2.90
Crew Boats										
Glenn C										
4 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	0.59	9.93	0.59	0.13	1.80	4.80	81.23	4.85	1.09	14.77
2 - 124 BHP Diesel Generator Engines (Detroit 4-71N)	*	*	*	*	*	0.58	9.87	0.59	0.13	1.80
Doug C										
3 - 535 BHP Diesel Main Engines (Detroit 6062)	*	*	*	*	*	*	*	*	*	*
2 - 50.5 BHP Diesel Generator Engines (Lugger L984)	*	*	*	*	*	*	*	*	*	*
Jackie C										
4 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	*	*	*	*	*	*	*	*	*	*
2 - 65 BHP Diesel Generator Engines (Detroit 3-71)	*	*	*	*	*	*	*	*	*	*
1- 89 BHP Diesel Fire Water Pump Engine (Detroit 4-71)	*	*	*	*	*	*	*	*	*	*
Aces Wild										
3 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	*	*	*	*	*	*	*	*	*	*
2 - 65 BHP Diesel Generator Engines (Detroit 3-71)	*	*	*	*	*	*	*	*	*	*
Ryan T										
4 - 567 BHP Diesel Main Engines (Scania DI16)	*	*	*	*	*	*	*	*	*	*
2 - 40 BHP Diesel Generator Engines (Northern Light M30CW3 2)	*	*	*	*	*	*	*	*	*	*
Robbie Tide										
3 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	*	*	*	*	*	*	*	*	*	*
2 - 75 BHP Diesel Generator Engines (Detroit 3-71)	*	*	*	*	*	*	*	*	*	*
Patrick										
3 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	*	*	*	*	*	*	*	*	*	*
2 - 75 BHP Diesel Generator Engines (Detroit 3-71)	*	*	*	*	*	*	*	*	*	*
Danny C										
2 - 365 BHP Diesel Main Engines (Caterpillar 3406 C)	*	*	*	*	*	*	*	*	*	*
1 - 40 BHP Diesel Generator Engine (Isuzu 4JB1)	*	*	*	*	*	*	*	*	*	*
1 - 32 BHP Diesel Generator Engine (Northern Lights M20)	*	*	*	*	*	*	*	*	*	*
1 - 46 BHP Diesel Hydraulic Engine (Detroit 271)	*	*	*	*	*	*	*	*	*	*
Ace High										
2 - 650 BHP Diesel Main Engines (Detroit 12V92TI)	*	*	*	*	*	*	*	*	*	*
1 - 510 BHP Diesel Main Center Engine (Detroit 12V71TI)	*	*	*	*	*	*	*	*	*	*
2 - 65 BHP Diesel Generator Engines (Detroit 3-71)	*	*	*	*	*	*	*	*	*	*

TABLE NO. 4

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
Permit to Operate No. 01493
Permitted Emissions

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Equipment	TONS PER YEAR					POUNDS PER HOUR				
	ROC	NOx	PM	SOx	CO	ROC	NOx	PM	SOx	CO
Work Boat Engines										
San Miguel										
2 - 2000 BHP Diesel Main Engines (Caterpillar 3516B DITA SCAC)	1.02	17.22	1.03	0.23	3.13	7.71	130.49	7.79	1.74	23.73
2 - 247 BHP Diesel Generator Engines (Caterpillar 3306 DIT)	*	*	*	*	*	1.16	19.64	1.17	0.26	3.57
1 - 550 BHP Diesel Thruster Engine (Caterpillar 3408 DITA)	*	*	*	*	*	1.29	21.88	1.31	0.29	3.98
1 - 315 BHP Diesel Compressor Engine (Caterpillar 3306 DITA)	*	*	*	*	*	0.74	12.51	0.75	0.17	2.27
1 - 306 BHP Diesel Aux Pump Engine (Caterpillar 3406 DIT)	*	*	*	*	*	0.72	12.17	0.73	0.16	2.21
1 - 273 BHP Diesel Winch Engine (Detroit 8V-71)	*	*	*	*	*	0.64	10.88	0.65	0.15	1.98
O'Neil Tide										
2 - 1125 BHP Diesel Main Engines (Caterpillar D399T/A)	*	*	*	*	*	*	*	*	*	*
2 - 243 BHP Diesel Generator Engines (Caterpillar 3306 DIT)	*	*	*	*	*	*	*	*	*	*
1 - 325 BHP Diesel Thruster Engine (Caterpillar 3406 DIT)	*	*	*	*	*	*	*	*	*	*
1 - 325 BHP Diesel Aux Fire Pump Engine (Caterpillar 3406 DIT)	*	*	*	*	*	*	*	*	*	*
2 - 243 BHP Diesel Aux Liquid Pump Engines (Caterpillar 3306 DIT)	*	*	*	*	*	*	*	*	*	*
Victory Seahorse										
2 - 2500 BHP Diesel Main Engines (EMD 16-645-ED3A)	*	*	*	*	*	*	*	*	*	*
2 - 200 BHP Diesel Generator Engines (Detroit 8V-71)	*	*	*	*	*	*	*	*	*	*
1 - 300 BHP Diesel Thruster Engine (Detroit 8V-71)	*	*	*	*	*	*	*	*	*	*
Santa Cruz										
2 - 2000 BHP Diesel Main Engines (Caterpillar 3516B)	*	*	*	*	*	*	*	*	*	*
2 - 245 BHP Diesel Generator Engines (Caterpillar 3306)	*	*	*	*	*	*	*	*	*	*
1 - 515 BHP Diesel Thruster Engine (Caterpillar 3408)	*	*	*	*	*	*	*	*	*	*
Toby Tide										
2 - 1125 BHP Diesel Main Engines (Caterpillar D399TA)	*	*	*	*	*	*	*	*	*	*
2 - 200 BHP Diesel Generator Engines (Detroit 8V-71)	*	*	*	*	*	*	*	*	*	*
1 - 300 BHP Diesel Thruster Engine (Detroit 8V-71)	*	*	*	*	*	*	*	*	*	*
Sea Tide										
2 - 1220 BHP Diesel Main Engines (DDEC 12V149TI)	*	*	*	*	*	*	*	*	*	*
2 - 200 BHP Diesel Generator Engines (Detroit 8V-71)	*	*	*	*	*	*	*	*	*	*
1 - 200 BHP Diesel Thruster Engine (Detroit 6V-71)	*	*	*	*	*	*	*	*	*	*
Robin J										
2 - 600 BHP Diesel Main Engines (GM 1692)	*	*	*	*	*	*	*	*	*	*
2 - 21 BHP Diesel Generator Engines (GM 471)	*	*	*	*	*	*	*	*	*	*
Jackie C										
4 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	*	*	*	*	*	*	*	*	*	*
2 - 65 BHP Diesel Generator Engines (Detroit 3-71)	*	*	*	*	*	*	*	*	*	*
1- 89 BHP Diesel Fire Water Pump Engine (Detroit 4-71)	*	*	*	*	*	*	*	*	*	*
Patriot II										
2 - 626 BHP Diesel Main Engines (Detroit 16V92)	*	*	*	*	*	*	*	*	*	*
2 - 103 BHP Diesel Generator Engines (Detroit 4-71)	*	*	*	*	*	*	*	*	*	*
1 - 103 BHP Diesel Fire Pump Engine (Detroit 4-71)	*	*	*	*	*	*	*	*	*	*
Kenneth Carl										
2 - 620 BHP Diesel Main Engines (Detroit 16V92)	*	*	*	*	*	*	*	*	*	*
2 - 76 BHP Diesel Generator Engines (Detroit 3-71)	*	*	*	*	*	*	*	*	*	*
1 - 103 BHP Diesel Fire Pump Engine (Detroit 4-71)	*	*	*	*	*	*	*	*	*	*
Glenn C										
4 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	*	*	*	*	*	*	*	*	*	*
2 - 124 BHP Diesel Generator Engines (Detroit 4-71N)	*	*	*	*	*	*	*	*	*	*
Doug C										
3 - 535 BHP Diesel Main Engines (Detroit 6062)	*	*	*	*	*	*	*	*	*	*
2 - 50.5 BHP Diesel Generator Engines (Lugger L984)	*	*	*	*	*	*	*	*	*	*
Patrick										
3 - 510 BHP Diesel Main Engines (Detroit 12V71TI)	*	*	*	*	*	*	*	*	*	*
2 - 75 BHP Diesel Generator Engines (Detroit 3-71)	*	*	*	*	*	*	*	*	*	*
For Use Throughout Leases										
16 - Oil Wells (11 active wells)	5.84					1.33				
Exempt Equipment										
Solvent Wipe Cleaning Operation										
* - Included in Emissions Above ** - Out of Service										
Total Permitted Emissions	17.36	46.74	4.02	2.77	122.69	88.46	437.16	28.26	390.80	547.28

HAP Emissions Ref: OCS HAP Emission Estimation Techniques and Calculations are included in the Reissuance Application and maintained at the facility.

5. OIL WELL LIST

This permit authorizes the operation of a maximum number of wells for the production of oil or natural gas. This section of the permit contains a list of the wells currently authorized to be operated. When changes to the list are desired, the permit holder is required to submit an application to modify the Part 70 Permit.

An Authority to Construct is also required prior to adding a well that is newly drilled to the oil well list or prior to increasing the number of wells on the oil well list.

Section No. 8, "Permit Specific Conditions", includes a condition that limits the maximum number of producing wells at this stationary source. If applicable, Section No. 8 also includes a condition that requires best available control technology (BACT) on specific wells that were subject to Rule 26, "New Source Review".

Ventura County Air Pollution Control District

OIL WELL LIST

Permit to Operate No. 01493

The following oil wells are on permit:

Slot Numbers

A-3
A-4
A-8
A-10
A-13
A-14
A-16
A-17
A-18
A-20
A-29

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6. EXEMPT EQUIPMENT LIST

Rule 33.2.A.3 (Part 70 Permits - Application Contents) requires the applicant to provide a list of all emissions units located at the stationary source that are exempt pursuant to Rule 23 based on size or production rate. Pursuant to Rule 33.2.A.3, emissions from insignificant activities do not need to be included in the permit application.

This section of the permit contains a table entitled "Insignificant Activities (Exempt Equipment)". This table is a list of insignificant activities (exempt equipment) at the facility that are exempt from permit based on a size or production rate exemption in Rule 23, "Exemptions From Permit". Insignificant Activity is defined in Rule 33.1 (Part 70 Permits – Definitions). The permittee shall provide calculations, usage records, emission records, and/or operational data as necessary to substantiate an activity as insignificant.

This table is presented for informational purposes only. Any changes to this list are not considered to be permit modifications, nor is the list considered to be enforceable. As detailed in Rule 33.2.A.3, this list is required to be submitted with an application for permit reissuance. The general requirements listed in Section No. 9 of this permit may apply to these insignificant activities.

Ventura County Air Pollution Control District

INSIGNIFICANT ACTIVITIES (EXEMPT EQUIPMENT)

INSIGNIFICANT ACTIVITIES (EXEMPT EMISSION UNITS)	BASIS FOR EXEMPTION (Size/Production Rate)	RULE 23 CITATION
48 BHP Ingersol Rand Diesel Air Compressor (C-5B), Emergency Generator Starter Engine	< 50 BHP	23.D.6
Wipecleaning Operation	ROC content $\leq$ 25 grams per liter	23.F.10.b

7. SPECIFIC APPLICABLE REQUIREMENTS (ATTACHMENTS)

As discussed in Section No. 2, "Permitted Equipment and Applicable Requirements Table", the emissions units at this stationary source listed in the table have requirements that are specifically applicable to them. The applicable requirements are based on the District's prohibitory rules, federal NSPS (40 CFR Part 60), federal NESHAPS (40 CFR Part 61), and federal NESHAPS/MACT (40 CFR Part 63).

In this section of the permit, the permit conditions that are associated with each specific applicable requirement are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No. or CFR No.) #" in the lower left corner. Each attachment has an applicability section that describes how and why this attachment applies to the specific emissions unit. The attachment may apply to one or more of the emissions units listed in the Permitted Equipment and Applicable Requirements Table in Section No. 2.

Ventura County Air Pollution Control District
Rule 71.1.B.1.a Applicable Requirements
Tanks Equipped with Vapor Recovery

Rule 71.1, "Crude Oil Production and Separation"
Adopted 06/16/92, Federally-Enforceable

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"
Adopted 03/10/98, Federally-Enforceable

Applicability:

This attachment applies to tanks at this stationary source equipped with a vapor recovery system which directs all vapors to a fuel gas system, a sales gas system, or to a flare. Specifically, this attachment applies to all storage tanks in a tank battery including wash tanks, produced water tanks, and wastewater separators, that are used in the production, gathering, storage, processing, and separation of crude oil and natural gas from any petroleum production permit unit prior to custody transfer. This attachment does not apply to portable tanks or other tanks not equipped with vapor recovery.

A tank is defined as a container, constructed primarily of nonearthen materials, used for the purpose of storing or holding petroleum material, or for the purpose of separating water and/or gas from petroleum material. A tank battery is defined as any tank or aggregation of tanks. An aggregation of tanks is considered a tank battery only if the tanks are located so that no one tank is more than 150 feet from any other tank, edge to edge.

The tank's hatches and other inlet and outlet liquid and gas piping connections are considered to be components subject to the leak requirements of APCD Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".

Conditions:

1. Pursuant to Rule 71.1.B.1.a, all tanks shall be equipped with a properly installed, maintained and operated vapor recovery system. The vapor disposal portion of the vapor recovery system shall consist of either a system which directs all vapors to a fuel gas system, a sales gas system, or to a flare that combusts reactive organic compounds.

2. Pursuant to Rule 71.1.D.2, the vapor recovery provisions of Rule 71.1.B.1.a shall not apply during maintenance operations on vapor recovery systems or tank batteries, including wash tanks, produced water tanks and wastewater separators, if the Air Pollution Control District is notified verbally at least 24 hours prior to the maintenance operation and if the maintenance operation will take no more than 24 hours to complete.

3. The tank's hatches and other inlet and outlet gas and liquid piping connections are components subject to the leak requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities".

4. On a quarterly basis, permittee shall monitor the storage tank vapor recovery system to ensure that compliance with Rule 71.1.B.1.a is being maintained. This shall include an inspection of the following components, as applicable, for proper operation: gas compressor, hatches, relief valves, pressure regulators, flare. Permittee shall keep dated records of the quarterly inspections and tank maintenance activities. These records shall be maintained at the facility and submitted to the District upon request.

5. On an annual basis, permittee shall certify that storage tanks at the facility are complying with Rule 71.1.B.1.a. This annual compliance certification shall include verifying that the tanks are equipped with a vapor recovery system.

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Ventura County Air Pollution Control District
Rule 71.4.C.1.c Applicable Requirements
Sumps, Pits, and Ponds Without Covers
Low ROC Content Exemption

Rule 71.4, "Petroleum Sumps, Pits, Ponds, and Well Cellars"
Adopted 06/08/93, Federally-Enforceable

Applicability:

This attachment applies to second or third stage sumps, pits, and ponds at facilities where crude oil or petroleum material is produced, gathered, separated, processed, or stored and where the ROC (reactive organic compound) content of the liquid entering the sump, pit, or pond is less than 5 milligrams per liter. Pursuant to Rule 71.4.C.1.c, the provisions of Rule 71.4 do not apply to any sump, pit, or pond if the ROC content of the liquid entering the sump, pit, or pond is less than 5 milligrams per liter.

A sump, pit, or pond is a receptacle, formed primarily of earthen materials, although it may be lined with artificial materials. A sump is further defined as "in continuous use for separating oil, water, sand or other material in petroleum production operations". A pit is further defined as "used to receive intermittent flows of petroleum material or crude oil. Neither a sample box of less than two (2) square feet in horizontal surface area nor a containment berm shall be considered a pit". A pond is further defined as "used to contain produced water from petroleum production processes for disposal or re-use. Ponds are not used for oil/water separation or evaporation".

Conditions:

1. Pursuant to Rule 71.4.C.1.c, the ROC content of the liquid entering a sump, pit, or pond shall not exceed 5 milligrams per liter.

2. Permittee shall perform routine surveillance of the applicable sump, pit, or pond to ensure that compliance with Rule 71.4.C.1.c is being maintained. This routine surveillance shall include verifying that there is no change in the sump, pit, or pond contents or method of operation.

3. Under the authority of Rule 71.4.D.1, the District shall require any person claiming an exemption pursuant to Rule 71.4.C.1.c to validate the exemption for each sump, pit, or pond on an annual basis. Records of such validation shall be maintained at the facility, and shall be submitted to the District, in writing, with the annual compliance certification, and shall include the results of an independent laboratory analysis.

Pursuant to Rule 71.4.F, the ROC content of crude oil or petroleum material in milligrams per liter shall be determined by EPA Method 8015. Samples will be analyzed using purge and trap (EPA Method 5030), and stock standards will be prepared from gasoline. Sampling shall occur at the entry point of the device.

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Ventura County Air Pollution Control District
Rules 74.9.B.1 and 74.9.B.2 Applicable Requirements
Stationary Natural Gas-Fired Rich-Burn Internal Combustion Engines

Rule 74.9, "Stationary Internal Combustion Engines"
Adopted 11/08/05, Federally-Enforceable

Applicability:

This attachment applies to stationary natural gas-fired rich-burn internal combustion engines rated at 50 or more horsepower, and not subject to the provisions of APCD Rule 74.16, "Oilfield Drilling Operations". A rich-burn engine is defined by Rule 74.9 to be a two or four-stroke spark-ignited engine where the manufacturer's original recommended operating air/fuel ratio divided by the stoichiometric air/fuel ratio is less than or equal to 1.1.

Conditions:

1. Pursuant to Rules 74.9.B.1 and 74.9.B.2, emissions from an applicable engine shall not exceed the following limits:

   a. Oxides of Nitrogen (NOx expressed as NO_2), either:

      1. 25 ppmvd referenced at 15% oxygen; or
      2. A 96% reduction by volume, as measured concurrently across an emission control device.

   b. Reactive Organic Compounds (ROC): 250 ppmvd referenced at 15% oxygen, expressed as methane

   c. Carbon Monoxide (CO): 4500 ppmvd referenced at 15% oxygen

   Compliance with this condition shall be verified by a biennial source test, conducted in accordance with Condition No. 2.

2. Pursuant to Rule 74.9.B.4, the permittee shall perform a biennial source test on an applicable engine utilizing the following methods as detailed in Rule 74.9.G:

a.	NOx	ARB Method 100
b.	CO	ARB Method 100
c.	ROC	EPA Method 25 or EPA Method 18
d.	Oxygen Content	ARB Method 100
e.	Gaseous Fuel Heating Value	ASTM Method D1826-77

Source test data point intervals for ARB Method 100 tests shall be no greater than 5 minutes and data points shall be averaged over 15 consecutive minutes. Prior to conducting a biennial emissions test, the permittee shall notify the District Compliance Division. Written notification shall be received no less than 15 calendar days prior to the test. The emissions test report and results shall be submitted to the District Compliance Division within 45 days after the test.

Pursuant to the exemption of Rule 74.9.D.2, this testing condition does not apply to an engine if it is operated less than 200 hours in a calendar year. If operated for more than 200 hours in a year, source testing shall be performed by no later than March 1 of the following year, or by 24 months after the last source test, whichever occurs last. In order to qualify for this exemption, the engine shall be equipped with a non-resettable elapsed operating hour meter.

3. Pursuant to Rule 74.9.B.5, the permittee shall perform a screening analysis of NOx and CO emissions on a quarterly basis unless:

   a. The biennial source test specified above is required, or
   b. The engine operated less than 32 hours in each of the three months of the applicable quarter, as measured by a non-resettable elapsed operating hour meter.

   The permittee shall notify the District Compliance Division by telephone 24 hours prior to any quarterly screening analysis.

4. Pursuant to Rule 74.9.C, the permittee shall maintain a District approved Engine Operator Inspection Plan. The plan shall include a specific emission inspection procedure to assure that the engine is operated in continual compliance with the provisions of Rule 74.9. The procedure shall include an inspection schedule. At a minimum, inspections shall be conducted quarterly unless the engine operated less than 32 hours in each of the three months of the applicable quarter, as measured by a non-resettable elapsed operating hour meter.

   The plan shall be updated after any change in operation. For new engines or modifications to existing engines, the plan shall be submitted to and approved by the District prior to issuance of the Permit to Operate.

5. Pursuant to Rule 74.9.E, Recordkeeping Requirements, the operator shall maintain an inspection log for each engine containing, at a minimum, the following data:

   a. Identification and location of each engine subject to Rule 74.9;
   b. Date and results of each screening analysis and inspection,
   c. A summary of any emissions corrective maintenance taken, and
   d. Any additional information required in the Engine Operator Inspection Plan.

For each engine exempt from quarterly screening analysis and quarterly inspection for operation less than 32 hours in each of the three months of the applicable quarter, the permittee shall record total hours of operation each month.

6. Pursuant to Rule 74.9.F, Reporting Requirements, the Annual Compliance Certification shall include the following information:

   a. Engine manufacturer, model number, operator identification number, and location.
   b. A summary of maintenance reports during the renewal period, including quarterly screening data if applicable.

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Ventura County Air Pollution Control District
Rule 74.9.D.3 Applicable Requirements
Emergency Standby Stationary Internal Combustion Engines
Operated During Either an Emergency or Maintenance Operation

Rule 74.9, "Stationary Internal Combustion Engines"
Adopted 11/08/05, Federally-Enforceable

Applicability:

This attachment applies to emergency standby stationary internal combustion engines rated at 50 or more horsepower, not subject to the provisions of APCD Rule 74.16, "Oilfield Drilling Operations", and operated during an emergency or maintenance operation. Maintenance operation is limited to 50 hours per calendar year. Pursuant to Rule 74.9.D.3, emergency standby stationary internal combustion engines operated during an emergency or during maintenance operation of no more than 50 hours per calendar year are exempt from Sections B, C, and E of Rule 74.9.

As detailed in Rule 74.9.I.2 an emergency standby engine is defined as an internal combustion engine used only when normal power line or natural gas service fails, or for the emergency pumping of water for either fire protection or flood relief. An emergency standby engine may not be operated to supplement a primary power source when the load capacity or rating of the primary power source has been either reached or exceeded.

Conditions:

1. Pursuant to Section D.3 of Rule 74.9, an applicable emergency standby stationary internal combustion engine shall only be operated during an emergency or during maintenance operation of not more than 50 hours per calendar year.

   Pursuant to Section I.5 of Rule 74.9, a maintenance operation is defined as the use of an emergency standby engine and fuel system during testing, repair and routine maintenance to verify its readiness for emergency standby use.

2. Pursuant to Section D.3 of Rule 74.9, each emergency standby engine shall be equipped with an operating, non-resettable, elapsed hour meter.

3. Pursuant to Section F.1 of Rule 74.9, the Annual Compliance Certification shall include the following records for each emergency standby engine: Engine manufacturer, model number, operator identification number, and location.

4. Pursuant to Section F.2 of Rule 74.9, the annual engine hours of maintenance operation shall be reported annually. A report shall be provided to the District after every calendar year by February 15.

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Ventura County Air Pollution Control District
Rule 74.9.D.8 Applicable Requirements
Stationary Diesel-Fired Internal Combustion Engines
Permitted Capacity Factor of 15 Percent or Less

Rule 74.9, "Stationary Internal Combustion Engines"
Adopted 11/08/05, Federally-Enforceable

Applicability:

This attachment applies to stationary diesel-fired internal combustion engines rated at 50 or more horsepower, and not subject to the provisions of APCD Rule 74.16, "Oilfield Drilling Operations". As detailed in Rule 74.9.D.8, stationary diesel-fired internal combustion engines with a permitted capacity factor of 15 percent or less are exempt from Sections B, C, and E of Rule 74.9. The "permitted capacity factor" is defined as the annual permitted fuel use divided by the manufacturer's specified maximum hourly fuel consumption times 8760 hours per year. Specifically, this attachment applies to diesel engines that qualify for the 15 percent or less permitted capacity factor exemption.

Conditions:

1. Pursuant to Rule 74.9.D.8, the provisions of Section B (Requirements), Section C (Engine Operator Inspection Plan), and Section E (Recordkeeping Requirements) of Rule 74.9 shall not apply to stationary internal combustion diesel engines with a permitted capacity factor of 15 percent or less.

2. Each engine shall have a permitted annual diesel fuel limit stipulated in the Permit to Operate which equates to no more than 15 percent annual capacity.

3. The operator maintain the following records and submit them to the District upon request:

    a. Data for each engine verifying the manufacturer's specified maximum hourly fuel consumption;
    b. Data specifying the actual annual usage (e.g., fuel consumption or operating hours); and
    c. Data for each engine including the engine manufacturer, model number, operator identification number, and location of each engine.

4. The Annual Compliance Certification shall include a report of the engine's hours of operation or fuel usage.

Ventura County Air Pollution Control District
Rule 74.9.D.9 Applicable Requirements
Stationary Diesel-Fired Internal Combustion Engines
Used to Power Cranes and Welding Equipment

Rule 74.9, "Stationary Internal Combustion Engines"
Adopted 11/08/05, Federally-Enforceable

Applicability:

This attachment describes the requirements of APCD Rule 74.9, "Stationary Internal Combustion Engines", and applies to stationary diesel-fired internal combustion engines rated at 50 or more horsepower, and not subject to the provisions of APCD Rule 74.16, "Oilfield Drilling Operations".

As detailed in Rule 74.9.D.9, stationary diesel-fired internal combustion engines used to power cranes and welding equipment are exempt from Sections B, C, and E of Rule 74.9.

Specifically, this attachment applies to diesel engines that are exempt because they are used to power cranes and welding equipment.

Conditions:

1. Pursuant to Rule 74.9.D.9, the provisions of Section B (Requirements), Section C (Engine Operator Inspection Plan), and Section E (Recordkeeping Requirements) of Rule 74.9 shall not apply to stationary internal combustion diesel engines used to power cranes and welding equipment.

2. The engine shall only be used to power a crane or welding equipment.

3. The operator shall maintain data for each engine including the function (usage) of the engine, manufacturer, model number, operator identification number, and location of each engine.

4. Permittee shall perform routine surveillance of the diesel-fired engine to ensure that compliance with Rule 74.9.D.9 is being maintained.

Ventura County Air Pollution Control District
California Airborne Toxic Control Measure For
Stationary Compression Ignition Engines
Engines Used Solely on OCS Platforms

Section 93115, Title 17, California Code of Regulations, Airborne Toxic Control Measure For Stationary Compression Ignition (CI) Engines
Effective 05/19/11

The District is required to implement and enforce the state ATCM. The ATCM is not federally-enforceable.

Applicability:

This attachment describes the requirements of California Airborne Toxic Control Measure (ATCM) For Stationary Compression Ignition (CI) Engines that apply to in-use stationary diesel-fueled CI engines that are operated solely on OCS Platforms. Section 93115.3(h) of the ATCM exempts such engines from the operating requirements and emission standards for new and in-use engines as listed in Sections 93115.6 and 93115.7 of the ATCM. Pursuant to Section 93115.4(a)(8) CARB Diesel Fuel means any diesel fuel that meets the specifications of vehicular diesel fuel, as defined in title 13, CCR, sections 2281 and 2282. The Verification Procedure is defined in Section 93115.4(a)(78).

Conditions:

1. Pursuant to subsection 93115.5(a), as of January 1, 2006, the permittee shall not fuel the engine with any fuel unless the fuel is one of the following:

    a. CARB Diesel Fuel, or
    b. An alternative diesel fuel that is:
        1) biodiesel;
        2) a biodiesel blend that does not meet the definition of CARB diesel Fuel
        3) a Fischer-Tropsch fuel; or
        4) an emulsion of water in diesel fuel; or
    c. any alternative diesel fuel that is not identified in section 93115.5(a)(2) and meets the requirements of the Verification Procedure; or
    d. an alternative fuel; or
    e. CARB Diesel Fuel used with fuel additives that meets the requirements of the Verification Procedure; or
    f. any combination of the above.

2. Pursuant to subsection 93115.10(f)(1), the permittee shall keep records and prepare a monthly summary that shall list and document the nature of use for each of the following:

a. Emergency use hours of operation;
b. Maintenance and testing hours of operation;
c. Type of fuel use in the engines. For engines operated exclusively on CARB Diesel Fuel, the owner or operator shall document the use of CARB Diesel Fuel through the retention of fuel purchase records indicating that the only fuel purchased for supply to an emergency standby engine was CARB Diesel Fuel; or for engines operated on any fuel other than CARB Diesel Fuel, the fuel records demonstrating that the only fuel purchased and added to an emergency standby engine or engines, or to any fuel tank directly attached to an emergency standby engine or engines, meets the requirements of section 93115.5(b).

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Ventura County Air Pollution Control District
National Emission Standards for Hazardous Air Pollutants
For Stationary Reciprocating Internal Combustion Engines
Existing Emergency Diesel Engines at an Area Source of HAPs

40 CFR Part 63, Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" (RICE MACT)

Applicability:

The NESHAP for Stationary Reciprocating Internal Combustion Engines is applicable to all stationary reciprocating internal combustion engines (RICE) at both major and area sources of hazardous air pollutants. The NESHAP is applicable to both compression ignition (CI – diesel) engines and spark ignition (SI – natural gas, landfill gas, gasoline, propane, etc.) engines. The specific conditions below are for existing emergency diesel engines at an area source. An engine is defined as "existing" if it was constructed before June 12, 2006. A stationary source is defined as an "area source" if it is not a major source of HAP (Hazardous Air Pollutants) emissions; meaning the stationary source does not emit or have the potential to emit any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year.

Pursuant to Section 63.6675, an "emergency engine" is any engine whose operation is limited to emergency situations and required testing and maintenance. An emergency can be the loss of grid power or the stationary source's own power production. Stationary RICE used for peak shaving or as part of a financial arrangement to supply power into the grid, or as a part of a demand response program are not considered emergency stationary RICE.

Pursuant to Section 63.6595(a)(1), the permittee must comply with the applicable operating requirements no later than May 3, 2013.

Conditions:

1. Pursuant to Section 63.6603(a), Table 2d, the permittee shall comply with the following operating requirements:

    a. Change oil and filter every 500 hours of operation or annually, whichever comes first. An oil analysis program as described in Section 63.6625(i) can be utilized in order to extend the specified oil change requirement.

    b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.

    c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Pursuant to Table 2d, if an emergency RICE is operating during an emergency and it is not possible to perform the above maintenance or if performing the maintenance would otherwise pose an unacceptable risk under federal, state, or local law, the maintenance can be delayed and should be performed as soon as practicable after the emergency has ended or the unacceptable risk has abated. All such maintenance delays shall be reported to the APCD Compliance Division.

2. Pursuant to Section 63.6625(e) and 63.6640(a), Table 6, the permittee shall operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop your own plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

3. Pursuant to Section 63.6625(f), the RICE shall be equipped with a non-resettable hour meter.

4. Pursuant to Section 63.6625(h), the permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

5. Pursuant to Sections 63.6640(f) and 63.6675, the permittee shall operate the emergency RICE in compliance with the following requirements:

    a. There is no time limit on the use of emergency stationary RICE in emergency situations.

    b. The use of the engine is limited to emergency situations and required testing and maintenance of the engine. An emergency can be the loss of grid power or the stationary source's own power production.

    c. The emergency stationary RICE may not be operated for peak shaving as part of a financial agreement to supply power into the grid, or as part of a demand response program, unless specifically allowed by this permit.

6. Pursuant to Sections 63.6655(e) and 63.655(f), the permittee shall maintain the following records:

    a. Records of maintenance conducted on the stationary emergency RICE.

    b. Records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent

for emergency operation, including what classified the operation as emergency, and how many hours are spent for non-emergency operation.

7. On an annual basis, the permittee shall certify that all engines at this stationary source are operating in compliance with 40 CFR Part 63, Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Engines" (RICE MACT).

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Ventura County Air Pollution Control District
National Emission Standards for Hazardous Air Pollutants
for Stationary Reciprocating Internal Combustion Engines
Existing Non-Emergency Diesel Engines ≤ 300 HP at an Area Source of HAPs

40 CFR Part 63, Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" (RICE MACT)

Applicability:

The NESHAP for Stationary Reciprocating Internal Combustion Engines is applicable to all stationary reciprocating internal combustion engines (RICE) at both major and area sources of hazardous air pollutants. The NESHAP is applicable to both compression ignition (CI – diesel) engines and spark ignition (SI – natural gas, landfill gas, gasoline, propane, etc.) engines. The specific conditions below are for existing non-emergency diesel engines rated at less than or equal to 300 HP (horsepower) at an area source. An engine is defined as "existing" if it was constructed before June 12, 2006. A stationary source is defined as an "area source" if it is not a major source of HAP (Hazardous Air Pollutants) emissions; meaning the stationary source does not emit or have the potential to emit any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year.

A non-emergency engine is any engine whose operation does not meet the definition of an "emergency engine" as defined in Section 63.6675. Pursuant to Section 63.6675, an "emergency engine" is any engine whose operation is limited to emergency situations and required testing and maintenance. An emergency can be the loss of grid power or the stationary source's own power production. Stationary RICE used for peak shaving or as part of a financial arrangement to supply power into the grid, or as a part of a demand response program are not considered emergency stationary RICE.

Pursuant to Section 63.6595(a)(1), the permittee must comply with the applicable operating requirements no later than May 3, 2013.

Conditions:

1. Pursuant to Section 63.6603(a), Table 2d, the permittee shall comply with the following operating requirements:

    a. Change oil and filter every 1,000 hours of operation or annually, whichever comes first. An oil analysis program as described in Section 63.6625(i) can be utilized in order to extend the specified oil change requirement.

    b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.

c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

2. Pursuant to Section 63.6604, the permittee shall use diesel fuel that meets the requirements in 40 CFR 80.510(b) for nonroad diesel.

3. Pursuant to Section 63.6625(e) and 63.6640(a), Table 6, the permittee shall operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop your own plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

4. Pursuant to Section 63.6625(h), the permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

5. Pursuant to Section 63.6655(e), the permittee shall maintain records of the maintenance conducted on the stationary RICE.

6. On an annual basis, the permittee shall certify that all engines at this stationary source are operating in compliance with 40 CFR Part 63, Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Engines" (RICE MACT).

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Ventura County Air Pollution Control District
National Emission Standards for Hazardous Air Pollutants
for Stationary Reciprocating Internal Combustion Engines
Existing Non-Emergency Spark-Ignited Four Stroke Rich Burn Remote Engines > 500 HP
at an Area Source of HAPs

40 CFR Part 63, Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" (RICE MACT)

Applicability:

The NESHAP for Stationary Reciprocating Internal Combustion Engines is applicable to all stationary reciprocating internal combustion engines (RICE) at both major and area sources of hazardous air pollutants. The NESHAP is applicable to both compression ignition (CI – diesel) engines and spark ignition (SI – natural gas, landfill gas, gasoline, propane, etc.) engines. The specific conditions below are for existing non-emergency natural gas, four stroke, rich burn remote engines greater than 500 horsepower at an area source.

An engine is defined as "existing" if it was constructed before June 12, 2006. A stationary source is defined as an "area source" if it is not a major source of HAP (Hazardous Air Pollutants) emissions; meaning the stationary source does not emit or have the potential to emit any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year. To qualify as a "remote" engine, there shall be no more than 5 buildings intended for human occupancy within a 0.25 mile radius around the engine and no buildings with four or more stories within a 0.25 mile radius around the engine. A stationary engine located in the Outer Continental Shelf (OCS) also id defined as a "remote" stationary engines.

Pursuant to Section 63.6595(a)(1), the permittee must comply with the applicable operating requirements no later than October 19, 2013.

Conditions:

1. Pursuant to Section 63.6603(a), Table 2d, the permittee shall comply with the following operating requirements:

    a. Change oil and filter every 2,160 hours of operation or annually, whichever comes first. An oil analysis program as described in Section 63.6625(i) can be utilized in order to extend the specified oil change requirement.

    b. Inspect spark plugs every 2,160 hours of operation or annually, whichever comes first, and replace as necessary.

    c. Inspect all hoses and belts every 2,160 hours of operation or annually, whichever

comes first, and replace as necessary.

2. Pursuant to Section 63.6640(a), Table 6, the permittee shall operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop your own plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

3. Pursuant to Section 63.6625(h), the permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

4. Pursuant to Section 63.6655, the permittee shall keep records of RICE engine maintenance (oil, spark plugs, hoses and belts) required by the engine operation and maintenance plan.

5. On an annual basis, the permittee shall certify that all engines at this stationary source are operating in compliance with 40 CFR Part 63, Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Engines" (RICE MACT).

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8. PERMIT SPECIFIC CONDITIONS (ATTACHMENTS)

As discussed in Section No. 2, "Permitted Equipment and Applicable Requirements Table", the emissions units at this stationary source listed in the table have requirements that are specifically applicable to them. The applicable requirements are primarily based on Rule 26, "New Source Review" requirements (e.g., BACT and offset requirements), or Rule 29, "Conditions on Permits" requirements (e.g., throughput recordkeeping requirements, specific requirements that limit emissions, etc.). These requirements are in addition to the specific applicable requirements listed in Section No. 7.

In this section of the permit, the permit conditions that are associated with each specific applicable requirement are listed in an individual attachment. The attachment is identified with the label "Attachment PO (Title V Permit No.) PC#" in the lower left corner. Each attachment has an applicability section that describes how and why this attachment applies to the specific emissions unit. The attachment may apply to one or more of the emissions units listed in the Permitted Equipment and Applicable Requirements Table in Section No. 2.

Ventura County Air Pollution Control District
Additional Permit Requirements
Platform Grace Additional Requirements

Rule 26, "New Source Review"

Rule 29, "Conditions on Permits"

For OCS sources, conditions applied pursuant to Rule 26 or Rule 29 are federally enforceable.

Applicability:

This attachment applies to Platform Grace. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. In order to comply with the throughput and consumption limits of this permit, the permittee shall maintain monthly records of throughput and consumption as detailed in Section No. 3, "Permitted Throughput and Consumption Limit Table", of this permit. The monthly records shall be summed for the previous 12 months. Throughput or consumption totals for any of these 12 calendar month rolling periods in excess of the specified limit shall be considered a violation of this permit. This is a general throughput and consumption recordkeeping condition and applies unless another throughput and consumption recordkeeping condition appears in this section of the permit. (Rule 29)

2. Combustion equipment listed in the Section No. 2 "Permitted Equipment and Applicable Requirements Table" and the Section No. 3 "Permitted Throughput and Consumption Limit Table" as being fired on natural gas shall only burn natural gas and are not permitted to burn any other fuel. (Rule 26)

3. The permitted emissions authorized by this permit are based in part on the fugitive emissions from 16 oil wells. Wells with dual completions are considered separate oil wells. This platform currently has 11 oil well completions. An Authority to Construct is required to be obtained from the District prior to drilling any wells, unless that activity is a redrill. Emission offsets must also be provided with the submittal of any application to increase the number of wells beyond 16 wells. (Rule 29)

4. All diesel fuel consumed in the Caterpillar backup generator engine, crane engines, and in the boats shall contain 0.05% sulfur by weight, or less. In order to comply with this condition, permittee shall maintain fuel records, or certification from the fuel supplier, documenting the sulfur content of each diesel fuel delivery. (Rule 29)

5. The permitted emissions for crew boats, work boats, and specialty vessels (as defined below) servicing this OCS Platform shall not exceed the following limits:

	ROC	NOx	PM	SOx	CO
Tons/Year	1.61	27.15	1.62	0.36	4.93

In order to comply with this condition, the permittee shall maintain monthly records of diesel fuel consumption for all crew boats, work boats, and specialty vessels servicing Venoco OCS Platforms Grace and Gail. Boats not owned by Venoco that are providing emergency oil spill response or training shall not be included in these records. The fuel usage, in gallons, shall be allocated 35% to Platform Grace and 65% to Platform Gail for the work boat and 40% to Platform Grace and 60% to Platform Gail for the crewboat. Specialty vessel fuel usage shall be allocated to the platform at which the service is being provided. The fuel usage figures, in gallons per month, shall be multiplied by the following District approved emission factors, in units of pounds per thousand gallons (lbs/Mgal), and multiplied by the appropriate conversion factors to obtain emissions in units of tons per month:

	ROC	NOx	PM	SOx	CO
Lbs/Mgal	33.15	561.00	33.50	7.50	102.00

Using these emission factors, the annual permitted emissions for the crew and work boats at this platform are equivalent to an annual diesel fuel limitation of 96,792 gallons per year.

The monthly boat emissions shall be summed for the previous 12 months. The emission totals for the previous 12 months in excess of the above limits shall be considered to be a violation of this condition.

This boat emission calculation method is for the purposes of demonstrating compliance with the above permitted emission limits only. If permittee wishes to submit an application to create an ERC (emission reduction credit) from reducing permitted emissions from boats servicing this platform, an analysis shall be submitted with the application, as required by APCD Rule 26.4.E.2, to demonstrate that the emission reduction is real, quantifiable, permanent, enforceable, and surplus. This analysis shall include, but is not limited to, source test data and actual fuel use data on individual boat engines that may be subject to an application for ERCs.

Specialty vessels are any vessels that are used for temporary projects at the platforms other than the crew and work boats listed in Condition Nos. 6 and 7 below and the permitted equipment tables, emergency oil spill response vessels, or training vessels. These vessels include, but are not limited to, derrick and/or crane barges and acidizing and/or cementing vessels. When such services are required, the permittee shall provide the APCD Compliance Division with a description of the vessel and its intended use, including the service to be performed and approximate days on site, at least 24 hours prior to such use. The vessel description shall include the name of the vessel and a description of all engines with a maximum rating of greater than or equal to 50 BHP, including make, model, and rated capacity (BHP). The permittee shall maintain a log showing the days and hours that each specialty vessel is in service at the platform.

(Rules 26 and 29)

6. There are forty-nine permitted engines which are used on nine Crew Boats:

"Glenn C"
4 - 510 BHP Diesel Main Engines, Detroit 12V71TI
2 - 124 BHP Diesel Generator Engines, Detroit 4-71N
"Doug C"
3 - 535 BHP Diesel Main Engines, Detroit 6062
2 - 50.5 BHP Diesel Generator Engines, Lugger L984
"Jackie C"
4 - 510 BHP Diesel Main Engines, Detroit 12V71TI
2 - 65 BHP Diesel Generator Engines, Detroit 3-71
1 - 89 BHP Diesel Fire Water Pump Engine, Detroit 4-71
"Aces Wild"
3 - 510 BHP Diesel Main Engines, Detroit 12V71TI
2 - 65 BHP Diesel Generator Engines, Detroit 3-71
"Ryan T"
4 - 567 BHP Diesel Main Engines, Scania DI16
2 - 40 BHP Diesel Generator Engines, Northern Light M30CW3.2
"Robbie Tide"
3 - 510 BHP Diesel Main Engines, Detroit 12V71TI
2 - 75 BHP Diesel Generator Engines, Detroit 3-71
"Patrick"
3 - 510 BHP Diesel Main Engines, Detroit 12V71TI
2 - 75 BHP Diesel Generator Engines, Detroit 3-71
"Danny C"
2 - 365 BHP Diesel Main Engines, Caterpillar 3406 C
1 - 40 BHP Diesel Generator Engine, Isuzu 4JB1
1 - 32 BHP Diesel Generator Engine, Northern Lights M20
1 - 46 BHP Diesel Hydraulic Engine, Detroit 271
"Ace High"
2 - 650 BHP Diesel Main Engines, Detroit 12V92TI
1 - 510 BHP Diesel Main Center Engine, Detroit 12V71TI
2 - 65 BHP Diesel Generator Engines, Detroit 3-71

These nine sets of crew boat engines shall not be used simultaneously for servicing Platform Grace. Only a single Crew Boat may be used at any given time at Platform Grace. The permittee shall maintain a log showing the days and hours that each crew boat is in service to Platform Grace. (Rule 29)

7. There are seventy-three permitted engines which are used on thirteen Work Boats:

"San Miguel"
2 - 2000 BHP Diesel Main Engines, Caterpillar 3516B DITA SCAC
2 - 247 BHP Diesel Generator Engines, Caterpillar 3306 DIT
1 - 550 BHP Diesel Thruster Engine, Caterpillar 3408 DITA
1 - 315 BHP Diesel Compressor Engine, Caterpillar 3306 DITA
1 - 306 BHP Diesel Aux Pump Engine, Caterpillar 3406 DIT
1 - 273 BHP Diesel Winch Engine, Detroit 8V-71
"O'Neil Tide"
2 - 1125 BHP Diesel Main Engines, Caterpillar D399T/A
2 - 243 BHP Diesel Generator Engines, Caterpillar 3306 DIT
1 - 325 BHP Diesel Thruster Engine, Caterpillar 3406 DIT
1 - 325 BHP Diesel Aux Fire Pump Engine, Caterpillar 3406 DIT
2 - 243 BHP Diesel Aux Liquid Pump Engines, Caterpillar 3306 DIT
"Victory Seahorse"
2 - 2500 BHP Diesel Main Engines, EMD 16-645-ED3A
2 - 200 BHP Diesel Generator Engines, Detroit 8V-71
1 - 300 BHP Diesel Thruster Engine, Detroit 8V-71
"Santa Cruz"
2 - 2000 BHP Diesel Main Engines, Caterpillar 3516B
2 - 245 BHP Diesel Generator Engines, Caterpillar 3306
1 - 515 BHP Diesel Thruster Engine, Caterpillar 3408
"Toby Tide"
2 - 1125 BHP Diesel Main Engines, Caterpillar 3516B
2 - 200 BHP Diesel Generator Engines, Detroit 8V-71
1 - 300 BHP Diesel Thruster Engine, Detroit 8V-71
"Sea Tide"
2 - 1220 BHP Diesel Main Engines, DDEC 12V149TI
2 - 200 BHP Diesel Generator Engines, Detroit 8V-71
1 - 200 BHP Diesel Thruster Engine, Detroit 6V-71
"Robin J"
2 - 600 BHP Diesel Main Engines, GM 1692
2 - 21 BHP Diesel Generator Engines, GM 471
"Jackie C"
4-510 BHP Diesel Main Engines, Detroit 12V71TI
2-65 BHP Diesel Generator Engines, Detroit 3-71
1-89 BHP Diesel Fire Water Pump Engine, Detroit 4-71
"Patriot II"
2-626 BHP Diesel Main Engines, Detroit 16V92
2-103 BHP Diesel Generator Engines, Detroit 4-71
1-103 BHP Diesel Fire Pump Engine, Detroit 4-71
"Kenneth Carl"
2-620 BHP Diesel Main Engines, Detroit 16V92

2-76 BHP Diesel Generator Engines, Detroit 3-71
1-103 BHP Diesel Fire Pump Engine, Detroit 4-71
"Glenn C"
4 - 510 BHP Diesel Main Engines, Detroit 12V71TI
2 - 124 BHP Diesel Generator Engines, Detroit 4-71N
"Doug C"
3 - 535 BHP Diesel Main Engines, Detroit 6062
2 - 50.5 BHP Diesel Generator Engines, Lugger L984
"Patrick"
3 - 510 BHP Diesel Main Engines, Detroit 12V71TI
2 - 75 BHP Diesel Generator Engines, Detroit 3-71

These thirteen sets of work boat engines shall not be used simultaneously for servicing Platform Grace. Only a single Work Boat may be used at any given time at Platform Grace. The permittee shall maintain a log showing the days and hours that each work boat is in service to Platform Grace. (Rule 29)

8. Pursuant to Rule 23.F.7, the use of solvents, in addition to the use of coatings, adhesives, lubricants, and sealants, for facility and building maintenance and repair is exempt from permit. However, the use of such materials by contractors for the maintenance and repair of process and industrial equipment is not exempt from permit pursuant to Rule 23.F.7, unless the material is exempted under another specific section of Rule 23. Pursuant to Rule 23.F.6, the use of non-refillable aerosol cans is exempt from permit. Pursuant to Rule 23.F.10, the use of cleaning agents certified by the SCAQMD as Clean Air Solvents (Rule 23.F.10.a) and the use of cleaning agents that contain no more than 25 grams per liter of ROC as used or applied, and no more than 5 percent by weight combined of methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, and chloroform (Rule 23.F.10.b), is also exempt from permit. This permit does not limit the usage of acetone. Acetone is exempt from permit and record keeping requirements, as it is not defined as a reactive organic compound.

In order to substantiate the solvent use exemptions listed above, the permittee shall maintain a list of all exempt solvents used at the stationary source and a reference to the specific permit exemption status.

(Rule 29)

9. The following ERC Certificate Nos. and amounts were used to offset the emission increases of the three 915 BHP Caterpillar Engine Nos. G-6A, G-6B, and G-6C and the one 1791 BHP Cummins diesel engine pursuant to Authority to Construct No. 01493-300 and Permit to Operate Application No. 01493-301:

ERC Certificate No.	ROC tpy	NOx tpy
1028	0.39	
1139	0.33	
1164		0.77
1182		0.71

The following ERC Certificate Nos. and amounts were used to offset the emission increases of the two 915 BHP Caterpillar Engine Nos. G-1A and G-1B pursuant to Authority to Construct No. 01493-320 and Permit to Operate Application No. 01493-321:

ERC Certificate No.	ROC tpy	NOx tpy
1025	0.16	
1026	0.11	
1027	1.01	
1029	0.03	
1182		1.60

The permittee has requested that these ERCs be temporary pursuant to Rule 26.4.F.4. The rule allows for ERCs to maintain a temporary status for up to three years. The temporary status allows the portion of the emission reduction credit which is used as an offset at a tradeoff ratio greater than 1.0 to be returned to the emission reduction certificate. In addition, a temporary emission reduction credit will not be discounted when it is re-banked. These emissions units were issued temporary permits on June 29, 2006. Therefore, the ERCs named above will maintain a temporary status until June 28, 2009. The permittee must apply to re-bank these credits prior to June 28, 2009 in order utilize the "temporary status" provisions outlined above and in Rule 26.4.F.4. If no application is received prior to June 28, 2009, then these ERCs will become permanent emission reduction credits. An application to re-bank the credits must include a commitment to shutdown the emissions units or replace the credits with permanent ERCs.

Note that no application to re-bank these emission reduction credits was received by the District prior to June 28, 2009. Therefore, these emission reduction credits cannot be referred to as "temporary" pursuant to Rule 26.4.F.4.

Ventura County Air Pollution Control District
Additional Permit Requirements
218.8 MMBTU/Hr Low Pressure Flare
1,006.3 MMBTU/Hr High Pressure Flare

Rule 71.1, "Crude Oil Production and Separation"
Federally-Enforceable OCS Version Adopted 06/16/92

Rule 29, "Conditions on Permits"

For OCS sources, conditions applied pursuant to Rule 29 are federally enforceable.

Applicability:

This attachment applies to the 218.8 MMBTU/Hr low pressure flare and the 1,006.3 MMBTU/Hr high pressure flare located on Platform Grace. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. Each flare shall have an individual fuel meter installed to record the amount of natural gas consumed. The flare volume for the combined use of the low pressure and high pressure flares shall be calculated using the following equation:

   (LP/HP Flare)mcf = (GR-81)mcf + (FM-5)mcf + (FM-4)mcf – (GR-83)mcf

   where:
   (LP/HP Flare) = combined gas volume at Platform Grace low and high pressure flares
   (GR-81) = low and high pressure gas volume from Platform Gail to Platform Grace
   (FM-5) = Platform Grace low pressure flare gas meter
   (FM-4) = Platform Grace high pressure flare gas meter
   (GR-83) = Gas meter at Platform Grace Generator G-3
   mcf = thousand cubic feet

   The recorded flare gas volume shall include pilot and purge gas. If this volume is not measured then it shall be estimated or calculated, by a method subject to District approval.

   (Rule 29)

2. Gas consumption for the combined use of the flares shall not exceed 12.50 million cubic feet of gas per year for any planned flaring events. There is no limit for emergency use. Emergency use is defined as the disposal of process gases in the event of unavoidable process upsets. A planned flaring event includes, but is not limited to, routine flaring to comply with Rule 71.1; or flaring due to planned maintenance performed on wells, equipment, or pipelines by the operator or performed by another operating accepting the

produced gas. If a process upset (emergency use) cannot be rectified in a reasonable amount of time, the use of the flare may be determined to be a planned flaring event.

In order to demonstrate compliance with this condition, the permittee shall maintain monthly records of flare gas consumption. The permittee shall maintain monthly records which differentiate between emergency use and planned flaring events. The monthly records shall be summed for the previous 12 months. Flare gas combustion totals for planned flaring events for any of these 12 month rolling periods in excess of the specified limit shall be considered a violation of this permit. (Rule 29)

3. Each flare shall be equipped and maintained with a continuous pilot or autoignition system to ensure combustion disposal of all excess produced or recovered gases. (Rule 71.1)

4. Permittee shall test the flare's ignition system monthly and shall maintain a monthly record of the flare's ignition system tests and maintenance activities, including the test date and operator's initials. (Rule 71.1)

5. The permittee shall maintain a monthly record of the total volume (mcf) of gas combusted in the flares pursuant to the equation stated in Condition No. 1. Monthly and twelve month rolling records shall be maintained for total flare usage and for planned flaring events (non-emergency use). Emergency usage and planned flaring are defined above. The permittee shall maintain records which differentiate between emergency usage and planned flaring events. (Rule 29)

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Ventura County Air Pollution Control District
Additional Permit Requirements
Caterpillar Diesel Backup Generator

Rule 29, "Conditions on Permits"

For OCS sources, conditions applied pursuant to Rule 29 are federally enforceable.

Applicability:

This attachment serves to address the additional requirement that applies to the 600 BHP Caterpillar Diesel Backup Electrical Generator located on Platform Grace. The following condition limits the facility's pounds per hour permitted emissions. This requirement is in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. The 600 BHP Caterpillar D379 diesel fired backup electricity generating engine shall only be operated for maintenance purposes, which shall not exceed 50 hours per year, or when the Waukesha 773 BHP Generator Engine (G-03) cannot be operated due to mechanical malfunction.

2. Note that the usage of the engine as described above meets the definition of an "emergency engine" as defined in 40 CFR Part 63, Subpart ZZZZ, "National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines." Therefore, the requirements of Attachment 40CFR63ZZZZN3 are applicable to this engine. The usage of this engine is not considered an emergency engine pursuant to District Rule 23, "Exemptions From Permit," and Rule 74.9, "Stationary Internal Combustion Engines."

Ventura County Air Pollution Control District
Additional Permit Requirements
Out of Service Tanks

Rule 29, "Conditions on Permits"

For OCS sources, conditions applied pursuant to Rule 29 are federally enforceable.

Applicability:

This attachment applies to any tank on permit with Platform Grace that is currently designated as "Out of Service". These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. Any tank designated as "Out of Service" is shut down and shall not be operated.

2. In order to ensure that compliance with this condition is being maintained, permittee shall annually certify that a tank designated as "Out of Service" is shut down and not being operated.

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Ventura County Air Pollution Control District
Additional Permit Requirements
773 BHP Waukesha 3521 GSI Generator Engine (G-03)

Rule 74.9, "Stationary Internal Combustion Engines"
Adopted 11/08/05, Federally-Enforceable

40 CFR Part 64, "Compliance Assurance Monitoring"
Federally Enforceable

Rule 26, "New Source Review"

Conditions applied pursuant to Rule 26 are federally enforceable.

Applicability:

This attachment applies to the 773 BHP Waukesha 3521 GSI Generator Engine (G-03) located on Platform Grace. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. The emissions of oxides of nitrogen (NOx as nitrogen dioxide) shall not exceed nine (9) parts per million by volume (ppmv) on a dry basis, corrected to 15 percent oxygen. This is a BACT (Best Available Control Technology) requirement of Rule 26 as detailed in Authority to Construct No. 1493-170. (Rule 26)

2. The emissions of reactive organic compounds (ROC) shall not exceed fifty (50) parts per million by volume (ppmv) on a dry basis, corrected to 15 percent oxygen, measured as methane. This is a BACT requirement of Rule 26 as detailed in Authority to Construct No. 1493-170. (Rule 26)

3. The emissions of carbon monoxide (CO) shall not exceed 1600 parts per million by volume (ppmv) on a dry basis, corrected to 15 percent oxygen. This is a BACT requirement of Rule 26 as detailed in Authority to Construct No. 1493-170. (Rule 26 – 2/13/96 revision)

4. Permittee shall have the engine source tested biennially pursuant to Rule 74.9 to determine the NOx, ROC, and CO emissions as detailed above and shall maintain the air to fuel ratio set point (or target) at the catalyst-out position (EG03) at 0.80 volts. This set point shall be monitored, measured, and recorded on a quarterly basis. The quarterly NOx and CO emissions screening shall be conducted as required by Rule 74.9.

Prior to conducting the source test, the permittee shall notify the APCD Compliance Division. Written notification shall be received 15 calendar days prior to the test. Additional monitoring, recordkeeping, reporting, and test method requirements for this engine are included in Attachment 74.9N3 in Section No. 7 of this permit. (Rule 26 and Rule 74.9)

5. In addition to the above source testing and engine monitoring requirements, the permittee shall comply with the monitoring requirements of 40 CFR Part 64, "Compliance Assurance Monitoring", as follows:

   a. The exhaust stack of the engine shall be equipped with a sampling port or other sampling location to allow the placement of a sampling probe downstream of the non-selective catalytic reduction system.

   b. On a daily basis, the permittee shall measure and record the concentration of nitrogen oxides and oxygen in the exhaust of the engine using a portable emissions analyzer. The concentration of nitrogen oxides, expressed as nitrogen dioxide, shall be measured in parts per million by volume on a dry basis (ppmvd) corrected to 15% oxygen. The portable analyzer may also be installed at a fixed location near the engine's exhaust in order to provide the required daily readings. The manufacturer and model of the portable emissions analyzer shall be subject to District approval.

   c. A nitrogen oxides concentration of greater than 9 ppmvd at 15% oxygen as measured by the portable emissions analyzer shall be considered an excursion as defined in 40 CFR Part 64. An excursion is defined as "a departure from an indicator range established for monitoring" in 40 CFR Part 64. Upon detecting such an excursion, the permittee shall inspect the engine and non-selective catalytic reduction system, make repairs or adjustments as necessary, and restore the engine exhaust emissions to less than 9 ppmvd at 15% oxygen as expeditiously as practicable in accordance with good air pollution control practices.

   d. The portable emissions analyzer shall be installed, calibrated, operated and maintained in accordance with the manufacturer's specifications and recommendations. On a biennial basis, the measured concentrations of nitrogen oxides of the portable analyzer shall be compared to the concentrations of nitrogen oxides as measured by ARB Method 100 as described in Rule 74.9.G. If this annual ARB Method 100 testing indicates that the engine is exceeding the nitrogen oxide limit of Condition No. 1 above when the portable emissions analyzer does not indicate an excursion, the permittee shall promptly notify the District and report this situation as a deviation from a Part 70 permit requirement.

e. In addition to the records required by Rule 74.9.E, the permittee shall maintain records of portable emissions analyzer readings for the engine including the date, time, nitrogen oxides concentration in ppmvd corrected to 15% oxygen, and for excursions as defined above, a summary of any corrective actions taken.

f. In addition to the reports required by Rule 74.9.F, the permittee shall submit a written report to the District Compliance Division that includes the number and duration of excursions, the cause of the excursion (including unknown if applicable), and the corrective action taken.

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Ventura County Air Pollution Control District
Additional Permit Requirements
300 BHP Diesel Engine No. 1 (North Crane)
300 BHP Diesel Engine No. 2 (South Crane)

Rule 29, "Conditions on Permits"

For OCS sources, conditions applied pursuant to Rule 29 are federally enforceable.

Applicability:

This attachment applies to the 300 BHP Diesel Engine No. 1 (North Crane) and the 300 BHP Diesel Engine No. 2 (South Crane) located on Platform Grace. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. Annual diesel fuel consumption at the North and South Cranes shall not exceed 7,344 gallons per year if there are any producing wells on Platform Grace. Annual diesel fuel consumption at the North and South Cranes shall not exceed 13,344 gallons per year if there are no producing wells on Platform Grace. The annual diesel fuel consumption in excess of 7,344 gallons was permitted without offsetting the emission increase pursuant to California Health and Safety Code Section 42301.13 (Olberg).

2. In order to comply with the consumption limits presented in Permit Condition No. 1 above, the permittee shall maintain monthly records of diesel fuel consumption in the crane engines which shall be summed for the previous 12 months. Consumption totals for any of these 12 calendar month rolling periods in excess of the specified limit shall be considered a violation of this permit.

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Ventura County Air Pollution Control District
Additional Permit Requirements
5 - 915 BHP Caterpillar G-399 SI-TA HCR Generator Engines
(G-6A, G-6B, G-6C, G-1A, G-1B)

Rule 74.9, "Stationary Internal Combustion Engines"
Adopted 11/08/05, Federally-Enforceable

40 CFR Part 64, "Compliance Assurance Monitoring"
Federally Enforceable

Rule 26, "New Source Review"

Rule 35, "Elective Emission Limits"

Conditions applied pursuant to Rule 26 or Rule 35 are federally enforceable.

Applicability:

This attachment applies to the five 915 BHP Caterpillar G-399 SI-TA HCR Generator Engines (G-6A, G-6B, G-6C, G-1A, G-1B) located on Platform Grace. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. Annual natural gas consumption for the combined use of the three 915 BHP Caterpillar engines identified as Unit Nos. G-6A, G-6B, and G-6C shall not exceed 60.00 million cubic feet.

   In order to comply with this condition, the permittee shall maintain monthly records of fuel consumption at Unit Nos. G-6A, G-6B, and G-6C. Monthly consumption levels shall be summed for the previous 12 months. Natural gas consumption for any of these 12 month periods in excess of the specified limit shall be considered a violation of this condition. (Rule 26)

2. Annual natural gas consumption for the combined use of the two 915 BHP Caterpillar engines identified as Unit Nos. G-1A and G-1B shall not exceed 126.72 million cubic feet.

   In order to comply with this condition, the permittee shall maintain monthly records of fuel consumption at Unit Nos. G-1A and G-1B. Monthly consumption levels shall be summed for the previous 12 months. Natural gas consumption for any of these 12 month

periods in excess of the specified limit shall be considered a violation of this condition. (Rule 26)

3. The emissions of oxides of nitrogen (NOx as nitrogen dioxide) for each of the five engines shall not exceed five (5) parts per million by volume (ppmv) on a dry basis, corrected to 15 percent oxygen. This is a BACT (Best Available Control Technology) requirement of Rule 26 pursuant to Authority to Construct Nos. 1493-300 and 01493-320. (Rule 26)

4. The emissions of reactive organic compounds (ROC) for each of the five engines shall not exceed fourteen (14) parts per million by volume (ppmv) on a dry basis, corrected to 15 percent oxygen, measured as methane. This is a BACT requirement of Rule 26 pursuant to Authority to Construct Nos. 1493-300 and 01493-320. (Rule 26)

5. The emissions of carbon monoxide (CO) for each of the five engines shall not exceed 71 parts per million by volume (ppmv) on a dry basis, corrected to 15 percent oxygen. This emission limit has been requested by the permittee pursuant to Rule 35, "Elective Emission Limits", pursuant to Authority to Construct Nos. 1493-300 and 01493-320. (Rule 35)

6. The Permittee shall have each engine source tested every 24 months pursuant to Rule 74.9.B.4 to determine compliance with the NOx, ROC, and CO emission limits detailed above. Prior to conducting the source test, the permittee shall notify the APCD Compliance Division. Written notification shall be received 15 calendar days prior to the test. Additional monitoring, recordkeeping, reporting, and test method requirements for these engines are included in Attachment 74.9N3 in Section No. 7 of this permit. (Rule 26 and Rule 74.9)

7. The Permittee shall perform a screening analysis of NOx and CO emissions at each engine to determine compliance with the emission limits detailed above. The screening analysis shall be conducted on a quarterly basis pursuant to Rule 74.9.B.5. The quarterly screening analysis is not required if (1) the biennial source test specified above is required that quarter; or (2) the engine operated less than 32 hours in each of the three months of the applicable quarter, as measured by a non-resettable elapsed operating hour meter. The permittee shall notify the District Compliance Division by telephone 24 hours prior to any quarterly screening analysis. (Rule 26 and Rule 74.9)

8. The five 915 BHP Caterpillar engines shall be fired on natural gas only. Records shall be maintained to substantiate that this is the type of fuel used. This is a BACT requirement of Rule 26 pursuant to Authority to Construct Nos. 1493-300 and 014932-320. (Rule 26)

9. The permittee shall comply with the monitoring requirements of 40 CFR Part 64, "Compliance Assurance Monitoring", as follows:

a. The exhaust stack of each engine shall be equipped with a sampling port or other sampling location to allow the placement of a sampling probe downstream of the non-selective catalytic reduction system.

b. On a daily basis, the permittee shall measure and record the concentration of nitrogen oxides and oxygen in the exhaust of each engine using a portable emissions analyzer. The concentration of nitrogen oxides, expressed as nitrogen dioxide, shall be measured in parts per million by volume on a dry basis (ppmvd) corrected to 15% oxygen. A portable analyzer may also be installed at a fixed location near each engine's exhaust in order to provide the required daily readings. The manufacturer and model of the portable emissions analyzer shall be subject to District approval.

c. A nitrogen oxides concentration of greater than 5 ppmvd at 15% oxygen as measured by the portable emissions analyzer shall be considered an excursion as defined in 40 CFR Part 64. An excursion is defined as "a departure from an indicator range established for monitoring" in 40 CFR Part 64. Upon detecting such an excursion, the permittee shall inspect the engine and non-selective catalytic reduction system, make repairs or adjustments as necessary, and restore the engine exhaust emissions to less than 5 ppmvd at 15% oxygen as expeditiously as practicable in accordance with good air pollution control practices.

d. The portable emissions analyzer shall be installed, calibrated, operated and maintained in accordance with the manufacturer's specifications and recommendations. On a biennial basis (every 24 months), the measured concentrations of nitrogen oxides of the portable analyzer shall be compared to the concentrations of nitrogen oxides as measured by ARB Method 100 as described in Rule 74.9.G. If this biennial ARB Method 100 testing indicates that an engine is exceeding the nitrogen oxide limit of Condition No. 3 above when the portable emissions analyzer does not indicate an excursion, the permittee shall promptly notify the District and report this situation as a deviation from a Part 70 permit requirement.

e. In addition to the records required by Rule 74.9.E, the permittee shall maintain records of portable emissions analyzer readings for each engine including the date, time, nitrogen oxides concentration in ppmvd corrected to 15% oxygen, and for excursions as defined above, a summary of any corrective actions taken.

f. In addition to the reports required by Rule 74.9.F, the permittee shall submit a written report to the District Compliance Division that includes the number and

duration of excursions, the cause of the excursion (including unknown if applicable), and the corrective action taken.

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Ventura County Air Pollution Control District
Additional Permit Requirements
7.07 Sqft Deck Drain Pit

Rule 29, "Conditions on Permits"

Rule 71.4, "Petroleum Sumps, Pits, Ponds, and Well Cellars"
Adopted 06/08/93, Federally-Enforceable

For OCS sources, conditions applied pursuant to Rule 29 are federally enforceable.

Applicability:

This attachment serves to address the additional requirement that applies to the 7.07 square foot Deck Drain Pit located on Platform Grace. This requirement is in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. The 7.07 sqft Deck Drain Pit is exempt from permit and APCD Rule 71.4, "Petroleum Sumps, Pits, Ponds, and Well Cellars", because the function of the pit is to act as a containment berm. Pursuant to the definitions in APCD Rule 71, "Crude Oil and Reactive Organic Compound Liquids", a containment berm shall not be considered a pit. (Rules 29 and 71.4)

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9. GENERAL APPLICABLE REQUIREMENTS (ATTACHMENTS)

The general applicable requirements are broadly applicable requirements that apply and are enforced in the same manner for all subject emissions units or activities. These requirements can normally be adequately addressed in the permit application with minimal or no reference to any specific emissions unit or activity, provided that the scope of the requirement and the manner of its enforcement are clear. Examples of such requirements include those that apply identically to all emissions units at a facility (e.g., source-wide opacity limits), general housekeeping requirements, and requirements that apply identical emissions limits to small units (e.g., process weight requirements).

As detailed in the Title V Permit Reissuance Application, general applicable requirements that apply to this facility were determined. The permit conditions associated with each generally applicable requirement are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No.) ____" in the lower left corner of each attachment. Each attachment has an applicability section that describes the emissions units to which the attachment applies. Each attachment may apply to one or more of the emissions units listed in the Applicable Requirements Table of Section No. 2. Note that these general applicable requirements may also apply to emissions units not required to be listed in the permit, such as those that are short-term.

Ventura County Air Pollution Control District
Rule 50 Applicable Requirements
Opacity

Rule 50, "Opacity"
Adopted 04/13/04, Federally-Enforceable

Applicability:

This attachment applies to all emissions units at this stationary source.

Conditions:

1. Pursuant to Rule 50.A, permittee shall not discharge into the atmosphere from any single source whatsoever any air contaminants for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, or equivalent to 20% opacity and greater, unless specifically exempted by Rule 50.

2. Permittee shall perform routine surveillance and visual inspections to ensure that compliance with Rule 50 is being maintained. A record shall be kept of any occurrence of visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. These records shall include the date, time, and identity of emissions unit. If the visible emissions problem cannot be corrected within 24 hours, permittee shall provide verbal notification to the District within the subsequent 24 hours. These visible emissions records shall be maintained at the facility and submitted to the District upon request.

3. On an annual basis, permittee shall certify that all emissions units at the facility are complying with Rule 50. This annual compliance certification shall include a formal survey identifying the date, time, emissions unit, and verification that there are no visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. As an alternative, the annual compliance certification shall include a formal survey identifying the date, time, emissions unit, and verification that there are no visible emissions for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, or equivalent to 20% opacity and greater, as determined by a person certified in reading smoke using EPA Method 9, or any other appropriate test method as approved in writing by the District, the California Air Resources Board, and the U.S. Environmental Protection Agency.

4. Upon District request, opacity shall be determined during routine surveillance and during the annual compliance certification by a person certified in reading smoke using EPA Method 9 or a certified, calibrated monitoring system.

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Ventura County Air Pollution Control District
Rule 54.B.1 Applicable Requirements
Sulfur Compounds - Sulfur Emissions at Point of Discharge - OCS

Rule 54, "Sulfur Compounds"
Adopted 06/14/94, Federally-Enforceable

Applicability:

This attachment applies to all emissions units at this OCS (Outer Continental Shelf) stationary source that emit sulfur compounds. This attachment addresses the requirements of Rule 54.B.1 for sulfur emissions at the point of discharge and includes the exemptions of Rule 54 for the unplanned burning of gas for emergency or safety concerns and for the planned burning of gas.

Conditions:

1. Pursuant to Rule 54.B.1.a, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, in excess of 300 ppm by volume from any combustion operation, calculated as sulfur dioxide (SO_2) by volume at the point of discharge.

2. Pursuant to Rule 54.B.1.b, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, in excess of 500 ppm by volume from any other operation, calculated as sulfur dioxide (SO_2) by volume at the point of discharge.

3. Pursuant to Rule 54.C.1 and 54.C.2, the sulfur dioxide emission limitations of Rule 54.B.1 do not apply to the unplanned burning of gas for emergency or safety concerns, or to the planned burning of gas, provided that all the conditions and requirements of Rule 54.C.1 for unplanned flaring, and Rule 54.C.2 for planned flaring events, have been met. For unplanned flaring, Rule 54.C.1 requires notification, recordkeeping, and reporting as detailed below. For planned flaring events, Rule 54.C.2 requires notification, a planned flaring management plan, recordkeeping, excess emissions fees, and reporting as detailed below.

4. Pursuant to Rule 54.C.1, the sulfur dioxide emission limitations of Rule 54.B.1 do not apply to the unplanned burning of gas for emergency or safety concerns provided all of the conditions of Rule 54.C.1 have been met. These include, but are not limited to, the following conditions:

    a. Permittee shall maintain records or logs of each flaring event as required by Rule 54.C.1.d.

b. Pursuant to Rule 54.C.1.f, the unplanned flaring event shall not exceed 24 hours in duration. If the flaring event exceeds one hour in duration, the operator shall:

1. Notify the District Enforcement Section as soon as reasonably possible, but no later than four hours after its detection by the operator.

2. Within one week after the flaring event, submit a written report to the District Enforcement Section which contains the records required by Rule 54.C.1.d, an estimate of the sulfur emissions, and pictures or descriptions of the equipment or controls that failed.

5. Pursuant to Rule 54.C.2, the sulfur dioxide emission limitations of Rule 54.B.1 do not apply to the planned burning of gas provided all of the conditions of Rule 54.C.2 have been met. These include, but are not limited to, the following conditions:

a. Permittee shall provide a 72 hour written notification to the District Enforcement Section as required by Rule 54.C.2.a.

b. Permittee shall have a planned flare management plan in place and approved by the District Enforcement Section as required by Rule 54.C.2.b.

c. Permittee shall maintain records of the date, time, duration, flare volume and estimated sulfur emissions (as pounds of SO_2) during the entire flaring event as required by Rule 54.C.2.c.

d. Pursuant to Rule 54.C.2.d, permittee shall notify the District Enforcement Section in writing when work is completed. The notice shall include all updated information from the 72 hour notification as detailed in Rule 54.C.2.a.

e. Pursuant to Rule 54.C.2.f, permittee shall provide a written report of excess emissions to the District Enforcement Section no later than 15 days after the end of each calendar year. Permittee shall pay a fee pursuant to APCD Rule 42.N for any excess emissions of SO_2.

6. Permittee shall maintain a representative fuel analysis or exhaust analysis to ensure that compliance with Rule 54.B.1 is being maintained. This analysis shall be provided to the District upon request.

7. Upon District request, sulfur compounds at the point of discharge shall be determined by source testing using EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or South Coast AQMD Test Method 307-94 (Determination of Sulfur in a Gaseous Matrix), as appropriate.

Ventura County Air Pollution Control District
Rule 54.B.2 Applicable Requirements
Sulfur Compounds - Sulfur Dioxide Concentration at Ground Level - OCS

Rule 54, "Sulfur Compounds"
Adopted 06/14/94, Federally-Enforceable

Applicability:

This attachment applies to all emissions units at this OCS (Outer Continental Shelf) stationary source that emit sulfur compounds. This attachment addresses the requirements of Rule 54.B.2 for sulfur emissions at ground or sea level at or beyond the property line of the stationary source and includes the exemptions of Rule 54 for the unplanned burning of gas for emergency or safety concerns and for the planned burning of gas.

Conditions:

1. Pursuant to Rule 54.B.2, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, as sulfur dioxide which results in average ground or sea level concentrations at any point at or beyond the property line in excess of 0.25 ppmv averaged over any one hour period, or 0.04 ppmv averaged over any 24 hour period.

2. Pursuant to Rule 54.C.1 and 54.C.2, the sulfur dioxide emission limitations of Rule 54.B.2 do not apply to the unplanned burning of gas for emergency or safety concerns, or to the planned burning of gas, provided that all the conditions and requirements of Rule 54.C.1 for unplanned flaring, and Rule 54.C.2 for planned flaring events, have been met. For unplanned flaring, Rule 54.C.1 requires notification, recordkeeping, and reporting as detailed below. For planned flaring events, Rule 54.C.2 requires notification, a planned flaring management plan, recordkeeping, excess emissions fees, and reporting as detailed below.

3. Pursuant to Rule 54.C.1, the sulfur dioxide emission limitations of Rule 54.B.2 do not apply to the unplanned burning of gas for emergency or safety concerns provided all of the conditions of Rule 54.C.1 have been met. These include, but are not limited to, the following conditions:

    a. Permittee shall maintain records or logs of each flaring event as required by Rule 54.C.1.d.

    b. Pursuant to Rule 54.C.1.f, the unplanned flaring event shall not exceed 24 hours in duration. If the flaring event exceeds one hour in duration, the operator shall:

1. Notify the District Enforcement Section as soon as reasonably possible, but no later than four hours after its detection by the operator.

2. Within one week after the flaring event, submit a written report to the District Enforcement Section which contains the records required by Rule 54.C.1.d, an estimate of the sulfur emissions, and pictures or descriptions of the equipment or controls that failed.

4. Pursuant to Rule 54.C.2, the sulfur dioxide emission limitations of Rule 54.B.2 do not apply to the planned burning of gas provided all of the conditions of Rule 54.C.2 have been met. These include, but are not limited to, the following conditions:

   a. Permittee shall provide a 72 hour written notification to the District Enforcement Section as required by Rule 54.C.2.a.

   b. Permittee shall have a planned flare management plan in place and approved by the District Enforcement Section as required by Rule 54.C.2.b.

   c. Permittee shall maintain records of the date, time, duration, flare volume and estimated sulfur emissions (as pounds of SO_2) during the entire flaring event as required by Rule 54.C.2.c.

   d. Pursuant to Rule 54.C.2.d, permittee shall notify the District Enforcement Section in writing when work is completed. The notice shall include all updated information from the 72 hour notification as detailed in Rule 54.C.2.a.

   e. Pursuant to Rule 54.C.2.f, permittee shall provide a written report of excess emissions to the District Enforcement Section no later than 15 days after the end of each calendar year. Permittee shall pay a fee pursuant to APCD Rule 42.N for any excess emissions of SO_2.

5. Permittee shall maintain a representative fuel analysis or exhaust analysis, along with modeling data or other demonstration to ensure that compliance with Rule 54.B.2 is being maintained. This analysis and compliance demonstration shall be provided to the District upon request.

6. Upon District request, pursuant to Rule 54.D.2, ground or sea level concentrations of SO_2 shall be determined by Bay Area Air Quality Management District Manual of Procedures, Volume VI, Section 1, Ground Level Monitoring for Hydrogen Sulfide and Sulfur Dioxide with the following amendments:

   a. The wind direction shall be continuously measured and recorded to within 5 degrees of arc, and wind speed shall be continuously measured and recorded to

within 0.25 miles per hour (mph) at wind speeds less than 25 mph and with a threshold no greater than 0.2 mph.

b. The meteorological instruments and siting requirements shall comply with the guidelines in "Quality Assurance Handbook for Air Pollution Measurements Systems, Volume IV, Meteorological Measurements," EPA/600/4-90/003.

c. The gas standards shall be restandardized against the reference wet chemical method at a minimum of once every 12 months, or be standardized using National Institute of Standards and Technology (NIST) standard gases.

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Ventura County Air Pollution Control District
Rule 57.1 Applicable Requirements
Particulate Matter Emissions From Fuel Burning Equipment

Rule 57.1, "Particulate Matter Emissions From Fuel Burning Equipment"
Adopted 01/11/05, Federally-Enforceable

Applicability:

This attachment applies to fuel burning equipment such as boilers, steam generators, process heaters, water heaters, space heaters, flares, and gas turbines. This attachment does not apply to internal combustion engines, jet engine test stands and rocket engine test stands, and rocket propellant testing devices and rocket fuel testing devices. This attachment also does not apply to exhaust gas streams containing particulate matter that was not generated by the combustion of fuel; such exhaust gas streams are subject to Rule 52 and Rule 53.

Conditions:

1. Pursuant to Section B of Rule 57.1, emissions of particulate matter shall not exceed 0.12 pounds per million BTU of fuel input.

   Particulate matter is defined as any material, except uncombined water, that exists in a finely divided form as a liquid or solid at standard conditions. Standard conditions are: a gas temperature of 68 degrees Fahrenheit (20 degrees Celsius) and a gas pressure of 14.7 pounds per square inch (760 mm. Hg) absolute.

2. Upon request of the District Compliance Division, compliance shall be determined by independent source test using CARB Method 5. The total particulate catch shall include the filter catch, probe catch, impinger catch, and the solvent extract, as specified in CARB Method 5. Any other appropriate test method may be used with prior written approval by the District, the California Air Resources Board, and the U.S. Environmental Protection Agency.

3. Periodic monitoring is not necessary to certify compliance with Rule 57.1. To certify compliance, a reference to the Rule 57.B District analysis dated December 3, 1997 is sufficient.

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Ventura County Air Pollution Control District
Rule 64 Applicable Requirements
Sulfur Content of Fuels - Gaseous Fuel Requirements

Rule 64, "Sulfur Content of Fuels"
Adopted 04/13/99, Federally-Enforceable

Applicability:

This attachment applies to all combustion emissions units at this stationary source while the emissions units are combusting gaseous fuels. Rule 64 shall not apply to any flare gas combustion, where no useful energy is produced and which is subject to Rule 54, "Sulfur Compounds".

Conditions:

1. Pursuant to Rule 64, no person shall burn at any time gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel (788 ppmv), calculated as hydrogen sulfide at standard conditions, unless specifically exempted by Rule 64.

2. If only Public Utilities Commission-regulated natural gas, propane, or butane is combusted at this facility, it will be assumed that the permittee is complying with Rule 64 without additional periodic monitoring requirements. Any person claiming this exemption shall maintain records sufficient to substantiate the use of these fuels.

3. If other than Public Utilities Commission-regulated natural gas, propane, or butane is being combusted, the permittee shall analyze the sulfur content of the fuel on an annual basis using South Coast AQMD Method 307-94 - Determination of Sulfur in a Gaseous Matrix or by ASTM D1072-90 (1994), Standard Test Method for Total Sulfur in Fuel Gases.

   Alternatively, when measuring the sulfur content of landfill or oilfield gaseous fuel, permittee may use the colormetric method ASTM D 4810-88 (Reapproved 1994) or the ASTM D4084-94 (Lead Acetate Reaction Rate Method) and may assume that the hydrogen sulfide content of the fuel gas adequately represents the total sulfur content. However, if the sulfur content as measured by ASTM D4810-88 or ASTM D4084-94 equals or exceeds 200 ppmv, then only South Coast AQMD Method 307-94 or ASTM D1072-90 (1994) shall be used to determine compliance.

   The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis may be used subject to the verification of the dilution ratio.

Permittee may use the colormetric method ASTM D 4810-88 (Reapproved 1994) for the measurement of the sulfur content of gaseous fuels other than landfill or oilfield gas only if written approval has been granted by the District and by US EPA.

4. Monitoring of the sulfur content of landfill or oilfield gaseous fuel by the permittee shall be at least quarterly if any of the following conditions apply:

   a. Any sulfur measurement exceeds 394 ppmv, calculated as hydrogen sulfide at standard conditions.

   b. A stationary source is new.

   c. The permittee has not reported historical measurements of hydrogen sulfide of the landfill or oilfield gaseous fuel performed within the previous three years in writing to the District for a stationary source.

   An operator may have the sulfur content of landfill or oilfield gaseous fuel monitored annually only, instead of quarterly, by satisfying the following provisions:

   a. During four consecutive calendar quarters, each sulfur content measurement shall not exceed 394 ppmv, calculated as hydrogen sulfide at standard conditions, and

   b. Submit a written request to the District for a reduction in monitoring frequency. This request shall contain backup documentation including monitoring reports that document the above provision. Requests for a reduction in monitoring frequency are not effective until written approval by the District is received by the operator.

   This annual fuel analysis, and the quarterly analyses if applicable, shall be maintained at the facility and a copy of the annual analysis shall be provided to the District with the annual compliance certification.

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Ventura County Air Pollution Control District
Rule 64 Applicable Requirements
Sulfur Content of Fuels - Liquid Fuel Requirements

Rule 64, "Sulfur Content of Fuels"
Adopted 04/13/99, Federally-Enforceable

Applicability:

This attachment applies to all combustion emissions units at this stationary source while the emissions units are combusting liquid fuels. This attachment does not apply to any combustion emission unit with sulfur emission controls.

Conditions:

1. Pursuant to Rule 64, no person shall burn any liquid fuels with a sulfur content in excess of 0.5 percent, by weight, unless specifically exempted by Rule 64.

2. If only ARB-quality reformulated gasoline or ARB-certified diesel fuel is combusted at this facility, it will be assumed that the permittee is complying with Rule 64 without additional periodic monitoring requirements. Any person claiming this exemption shall maintain records sufficient to substantiate the use of these fuels.

3. If other than ARB-quality reformulated gasoline or ARB-certified diesel fuel is being combusted, for each liquid fuel delivery permittee shall either obtain the fuel supplier's certification, or shall test the sulfur content of the fuel using ASTM Method D4294-98 or D2622-98, to ensure that compliance with Rule 64 is being maintained. For liquid fuels, operators of electric power generation units may use the sampling and analysis methods prescribed in Code of Federal Regulations 40CFR Part 75 Appendix D.2.2. The fuel supplier's certification may be provided once for each purchase lot, if records are kept of the purchase lot number of each delivery.

   The fuel sulfur content by weight data shall be maintained at the facility and shall be provided with the annual compliance certification.

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Ventura County Air Pollution Control District
Rule 71.1.C Applicable Requirements
Crude Oil Production and Separation - Produced Gas

Rule 71.1, "Crude Oil Production and Separation"
Adopted 06/16/92, Federally-Enforceable

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"
Adopted 03/10/98, Federally-Enforceable

Applicability:

This attachment applies to the emissions of produced gas from equipment used in the production, gathering, storage, processing, and separation of crude oil and natural gas from any petroleum production unit prior to custody transfer. Specifically, this attachment applies to gas collection systems that are hard-piped and closed systems that direct all produced gas to a fuel or sales gas system or to a flare.

Conditions:

1. Pursuant to Rule 71.1.C.1, the emissions of produced gas shall be controlled at all times using a properly maintained and operated closed system that directs all gas, except gas used in a tank battery vapor recovery system, to one of the following:

   a. A fuel or sales gas system
   b. A flare that combusts reactive organic compounds

2. Pursuant to Rule 71.1.C.2, the provisions of Rule 71.1.C.1 shall not apply to wells which are undergoing routine maintenance, or to exploratory wells (during the first two weeks of production) if the composition of the produced gas is unknown (i.e., new reservoir) and there are no existing gas handling systems within 150 feet of the well.

3. Permittee shall annually certify the produced gas collection system to ensure that compliance with Rules 71.1.C.1 is being maintained. This annual certification shall include a visual inspection assuring that the produced gas collection system is a closed system.

4. If a flare is used to control the produced gas, permittee shall inspect the flare on a quarterly basis to ensure that it is operating properly. A record of these inspections shall be maintained at the facility and shall be submitted to the District upon request.

5. The gas collection system's gas and liquid piping connections are components subject to the leak requirements of Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities". Compliance with Rule 74.10 at the gas collection system ensures compliance with the maintenance requirements of Rule 71.1.C.1.

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Ventura County Air Pollution Control District
Rule 71.4.B.1 Applicable Requirements
First Stage Sump Prohibition

Rule 71.4, "Petroleum Sumps, Pits, Ponds, and Well Cellars"
Adopted 06/08/93, Federally-Enforceable

Applicability:

This attachment applies to any first stage production sump at this stationary source. A first stage production sump is a sump that receives a stream of petroleum material directly from wells or a field gathering system. A sump is a receptacle, formed primarily of earthen materials, although it may be lined with artificial materials. A sump is further defined as "in continuous use for separating oil, water, sand, or other material in petroleum production operations".

Conditions:

1. Pursuant to Rule 71.4.B.1, no person shall install, maintain, or operate a first stage production sump. A first stage production sump is a sump that receives a stream of petroleum material directly from wells or a field gathering system.

2. In order to ensure that compliance with Rule 71.4.B.1 is being maintained, permittee shall annually certify that there are no first stage production sumps at the facility.

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Ventura County Air Pollution Control District
Rule 71.4.B.3 Applicable Requirements
Well Cellar Storage Prohibition

Rule 71.4, "Petroleum Sumps, Pits, Ponds and Well Cellars"
Adopted 06/08/93, Federally Enforceable

Applicability:

This attachment applies to any well cellar at this stationary source. This attachment addresses the requirements of Rule 71.4.B.3 which prohibits the storage of crude oil or petroleum material in a well cellar. Rule 71.4 applies to well cellars at facilities where crude oil or petroleum material is produced, gathered, separated, processed, or stored.

A well cellar is a lined or unlined area around one or more oil wells, allowing access to the wellhead components for servicing and/or installation of blowout prevention equipment.

Conditions:

1. Pursuant to Rule 71.4.B.3, no person shall store crude oil or petroleum material in a well cellar except during periods of equipment maintenance or well workover. In no case shall storage occur for more than five (5) calendar days.

2. Pursuant to Rule 71.4.C, the provisions of Rule 71.4 shall not apply to well cellars used in an emergency, if clean-up procedures are implemented within 24 hours after each emergency occurrence and if clean-up procedures are completed within fifteen (15) calendar days.

3. Permittee shall perform routine surveillance and visual inspections of well cellars to ensure that compliance with Rule 71.4.B.3 is being maintained.

4. Pursuant to Rule 71.4.D.2, any person storing crude oil in a well cellar during periods of equipment maintenance or well workover shall maintain records, which may include but are not limited to, workover invoice documents, indicating the date(s) the material was stored in the well cellar or the date(s) of workover activity. These records shall be submitted to the District upon request.

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Ventura County Air Pollution Control District
Rule 74.6 Applicable Requirements
Surface Cleaning and Degreasing

Rule 74.6, "Surface Cleaning and Degreasing"
Adopted 11/11/03, Federally-Enforceable

Applicability:

This attachment applies to all solvent cleaning activities at this stationary source, except those activities listed in Condition No. 11 that are exempt pursuant to Section E of Rule 74.6. This attachment does not apply to substrate surface preparation regulated by other APCD surface coating, adhesive, ink, resin, and solvent rules. "Solvent" is defined as any ROC-containing liquid used to perform solvent cleaning. "Solvent cleaning" is defined as the use of organic solvent to remove loosely held uncured adhesives, uncured inks, uncured coatings, uncured resins, and other contaminants which include, but are not limited to, dirt, soil, lubricants, coolant, moisture, grease, and fingerprints, from parts, tools, machinery, equipment, and general work areas.

This attachment also contains requirements, pursuant to Rule 74.6, for cold cleaners. A cold cleaner is defined in Rule 74.6 as any batch operated equipment designed to contain liquid solvent that is operated below the solvent's boiling point to carry out solvent cleaning operations. A specific type of cold cleaner is a "remote reservoir cold cleaner" which is a device in which solvent is moved through a sink-like work area for cleaning parts and drains immediately, without forming a pool, through a single drain hole less than 100 square centimeters (15.5 square inches) in area into an enclosed container that is not accessible for soaking parts. The freeboard height for remote reservoir cold cleaners is the distance from the top of the solvent drain to the top of the tank.

This attachment does not apply to solvent cleaning where an emission control system is used pursuant to Rule 74.6.B.5 or where an alternative cleaning system is used pursuant to Rule 74.6.B.6. Pursuant to APCD Rule 23.F.7, solvents used by the permittee for facility, ground, and building maintenance and repair are exempt from the requirement to have a permit. However, unless exempted by Rule 74.6.E, such solvents are required to comply with Rule 74.6.

Conditions:

1. Pursuant to Rule 74.6.B.1, no person shall perform solvent cleaning using solvent that exceeds the following limits:

    a. Solvents used for application equipment cleanup, and all other cleanup of uncured coatings, adhesives, inks, or resins, shall not exceed an ROC content of 900 grams per liter and an ROC composite partial pressure of 33 mmHg at 20^{o}C, as applied.

b. Solvents used for cleaning of electronic components, electrical apparatus components, medical devices, or aerospace components shall not exceed an ROC content of 900 grams per liter and an ROC composite partial pressure of 33 mmHg at 20°C, as applied.

c. Solvents used for cleaning for purposes other than those listed in (a) and (b) above shall not exceed an ROC content of 25 grams per liter, as applied.

2. Pursuant to Rule 74.6.B.2, no person shall perform solvent cleaning using a solvent with an ROC content greater than 25 grams per liter unless one of the following cleaning devices or methods is used:

a. Wipe cleaning where solvent is dispensed to wipe cleaning materials from containers that are kept closed to prevent evaporation, except while dispensing solvent or replenishing the solvent supply;

b. Non-atomized solvent flow, dip, or flush method where pooling on surfaces being cleaned is prevented or drained, and all solvent runoff is collected in a manner that enables solvent recovery or disposal. The collection system shall be kept closed to prevent evaporation except while collecting solvent runoff or emptying the collection system;

If the cleaning method has a solvent capacity more than one gallon, a cold cleaner or remote reservoir cold cleaner meeting the equipment and operating requirements of Condition Nos. 8, 9, and 10 of this attachment (Sections C and D of Rule 74.6) shall be used to comply with this requirement.

c. Application of solvent from a hand held spray bottle, squirt bottle or other closed container with a capacity of one liter or less;

d. A properly used enclosed gun washer or low emission spray gun cleaner.

3. Pursuant to Rule 74.6.B.3.a, no person shall allow liquid cleaning solvent to leak from any equipment or container.

4. Pursuant to Rule 74.6.B.3.b, no person shall specify, solicit, supply, or require any cleaning solvent or solvent cleaning equipment intended for uses governed by Rule 74.6 if such use would violate Rule 74.6. This prohibition applies to all written and oral contracts under which solvent cleaning operations subject to Rule 74.6 are to be conducted at any location in Ventura County.

5. Pursuant to Rule 74.6.B.3.c, no person shall use more than one gallon per week of

solvents containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform, or any combination of these solvents, in a total concentration greater than 5 percent by weight, for cold cleaning except in a cold cleaner operated in accordance with National Emission Standards for Halogenated Solvent Cleaning, 40 CFR Parts 9 and 63, Subpart T, Sections 63.460 through 63.469 (Degreasing MACT Standards). Any person that uses the above solvent in quantities less than one gallon per week shall maintain records of the volume and formulation of such solvent on an as-used basis (recording use each day such material is used). Records shall be saved for at least five (5) years from the date of each record and shall be made available to District personnel upon request.

6. Pursuant to Rule 74.6.B.4.a, all ROC-containing solvents shall be stored in non-absorbent, non-leaking containers that shall be kept closed at all times except when filling or emptying.

7. Pursuant to Rule 74.6.B.4.b, waste solvent and waste solvent residues shall be disposed of in a manner conforming with Division 20, Chapter 6.5 of the California Health and Safety Code.

8. Pursuant to Rule 74.6.C.1, all cold cleaners, except remote reservoir cold cleaners, shall be equipped with the following devices:

   a. A drying rack suspended above the solvent, or other facility for draining cleaned parts such that the drained solvent is returned to the cleaner.

   b. A cover that prevents the solvent from evaporating when not processing work in the cleaner. If high volatility solvent is used, the cover must be a sliding, rolling, or guillotine (bi-parting) type that is designed to easily open and close, or it must be designed to be easily operated with one hand. A high volatility solvent is an unheated solvent with an ROC composite partial pressure of greater than 2 mmHg @ 20^{o}C.

   c. A freeboard height of at least 6 inches (15.2 centimeters), if low volatility solvent is used. A low volatility solvent is an unheated solvent with an ROC composite partial pressure of 2 mmHg or less @ 20^{o}C.

   d. At least one of the following control devices, if high volatility solvent is used:

      1. A freeboard height such that the freeboard ratio is at least 0.75.
      2. A water cover if the solvent is insoluble in and heavier than water.

   e. A permanent conspicuous mark locating the maximum allowable solvent level that conforms with the applicable freeboard height requirement in Condition No. 8.c or 8.d.1.

f. A permanent conspicuous label or sign summarizing the applicable operating requirements appropriate for cold cleaning operations.

9. Pursuant to Rule 74.6.C.2, remote reservoir cold cleaners shall be equipped with the following devices:

a. A permanent conspicuous label or sign summarizing the applicable operating requirements appropriate for cold cleaning operations.

b. A sink-like work area that is sloped sufficiently towards the drain to preclude pooling of solvent.

c. A single drain hole, less than 100 square centimeters (15.5 square inches) in area, for the solvent to flow from the sink into the enclosed reservoir.

d. A freeboard height of at least 6 inches (15.2 centimeters).

e. A cover for the drain when no work is being processed in the cleaner and high volatility solvent is used. If low volatility solvent is used, a cover is not required.

10. Pursuant to Rule 74.6.D, any person who operates a cold cleaner shall conform to the following operating requirements:

a. The operator shall drain cleaned parts of all solvent until dripping ceases to ensure that the drained solvent is returned to the cleaner.

b. Solvent agitation, where necessary, shall be achieved using pump recirculation, a mixer, or ultrasonics. Air agitation shall not be used.

c. If a solvent flow is utilized, only a solid fluid stream (not a fine, atomized, or shower type spray) shall be used.

d. The pressure of the solvent flow system shall be such that liquid solvent does not splash outside the container.

e. No person shall remove or open any required device designed to cover the solvent unless work is being processed in the cleaner or maintenance is being performed on the cleaner.

f. The cleaning equipment and emission control equipment shall be operated and maintained in proper working order.

g. The cleaning of porous or absorbent materials such as cloth, leather, wood, or rope is prohibited. This provision shall not apply to paper gaskets or paper filters.

11. Pursuant to Rule 74.6.E.1, Rule 74.6 (all requirements of this permit attachment) shall not apply to:

a. Cleaning activities using Clean Air Solvent, or a solvent with an ROC-content no more than 25 grams per liter as applied. A "Clean Air Solvent" is a solvent certified by the South Coast Air Quality Management District as a Clean Air Solvent.

b. The use of up to 160 fluid ounces of non-refillable aerosol cleaning products per day, per facility.

c. Janitorial cleaning including graffiti removal.

d. Cleaning carried out in vapor degreasers or motion picture film cleaning equipment.

e. Any cleaning device or mechanism regulated by National Emission Standards for Halogenated Solvent Cleaning, 40 CFR Parts 9 and 63, Subpart T, Sections 63.460 through 63.469 (Degreasing MACT Standards).

f. Cleaning operations subject to any of the following rules:

Rule 74.3, Paper, Fabric and Film Coating Operations
Rule 74.5.1, Petroleum Solvent Dry Cleaning
Rule 74.5.2, Synthetic Solvent Dry Cleaning
Rule 74.19, Graphic Arts Operations
Rule 74.19.1, Screen Printing Operations
Rule 74.21, Semiconductor Manufacturing

g. Stripping of cured coating (e.g.; stripping), cured adhesive (e.g.; debonding, unglueing), cured ink, or cured resin.

h. The use of solvent for purposes other than solvent cleaning activities.

12. Pursuant to Rule 74.6.E.2, Rule 74.6.B.1 (Condition No. 1 of this attachment) shall not apply to:

a. Cleaning operations required to comply with any ROC content and/or composite vapor pressure limit in any of the following rules:

Rule 74.12, Surface Coating of Metal Parts and Products
Rule 74.13, Aerospace Assembly and Component Manufacturing Operations
Rule 74.14, Polyester Resin Material Operations
Rule 74.18, Motor Vehicle and Mobile Equipment Coating Operations
Rule 74.20, Adhesives and Sealants

Rule 74.24, Marine Coating Operations
Rule 74.24.1, Pleasure Craft Coating Operations
Rule 74.30, Wood Products Coatings

b. Cleaning of ultraviolet lamps used to cure ultraviolet inks coatings, adhesives or resins.

c. Cleaning of solar cells, laser hardware, scientific instruments, or high-precision optics.

d. Cleaning conducted in laboratory tests and analyses including quality assurance/quality control applications, or bench scale or short-term (less than 2 years) research and development programs.

e. Removal of elemental sodium from the inside of pipes and lines.

f. Cleaning of mold release compounds from molds.

g. Cleaning of tools used to cut or abrade cured magnetic oxide coatings.

h. Cleaning of aerospace assembly and subassembly surfaces that are exposed to strong oxidizers or reducers such as nitrogen tetroxide, liquid oxygen or hydrazine.

i. Cleaning of paper gaskets.

j. Cleaning of clutch assemblies where rubber is bonded to metal by means of an adhesive.

k. Cleaning of hydraulic actuating fluid from filters and filter housings.

l. Removal of explosive materials and constituents from equipment associated with manufacturing, testing or developing explosives.

m. Manufacturing cleaning of nuts and bolts designed for automotive racing applications, in a cold cleaner complying with Sections C and D of Rule 74.6 using solvent with an ROC content no more than 900 grams per liter and a ROC composite partial pressure no more than 5 mm Hg @ 20C.

n. Cleaning of precision–lapped mechanical seals in pumps that handle liquefied gasses, in a cold cleaner complying with Sections C and D of Rule 74.6 using solvent with an ROC content no more than 900 grams per liter and a ROC composite partial pressure no more than 5 mm Hg @ 20C.

o. Facilitywide use of less than 1 gallon per week of non-compliant solvent where compliant solvents are not available. Any person claiming this exemption shall maintain records of the volume and formulation of non-compliant solvent used on an as-used basis (recording use each day such material is used). Records shall be saved for at least five (5) years from the date of each record and shall be made available to District personnel upon request.

13. Pursuant to Rule 74.6.E.3, Rule 74.6 Sections B.1 and B.2 (Condition Nos. 1 and 2 of this attachment) shall not apply to aircraft engine gas path cleaning or stationary gas turbine gas path cleaning using solvent with an ROC content of 200 g/l or less, as applied.

14. Pursuant to Rule 74.6.F, the permittee shall maintain a current material list showing each ROC containing material used in solvent cleaning activities. The list shall summarize the following information:

a. Solvent name and manufacturer's description.

b. All intended uses of the solvent at the facility, classified as follows:

1. Cleanup, including application equipment cleaning, or
2. Cleaning of electronic components, electrical apparatus components, medical devices, or aerospace components, or
3. Solvent used pursuant to an exemption in Rule 74.6.E (specify the exemption claimed).

c. The ROC content in units of grams per liter of material (and ROC composite partial pressure in units of mm Hg @ 20C, if applicable) of the solvent.

d. If the solvent is a mix of materials blended by the operator, a record of the mix ratio.

This information shall be made available to District personnel upon request.

15. Permittee shall maintain the above records and perform routine surveillance of the applicable solvent cleaning activities to ensure that compliance with Rule 74.6 is being maintained. Upon request of the District, compliance with Rule 74.6 shall be determined using the following methods:

a. Pursuant to Rule 74.6.G.1, the ROC content of materials shall be determined by EPA Test Method 24 (40 CFR Part 60, Appendix A).

b. Pursuant to Rule 74.6.G.4, the identity of components in solvents shall be determined using manufacturer's formulation data or by using ASTM E168-67, ASTM E169-87, or ASTM E260-85.

c. Pursuant to Rule 74.6.G.5, ROC composite partial pressure of a solvent shall be calculated using a widely accepted published source such as: Boublik, T., V. Fried and E. Hala, "The Vapor Pressure of Pure Substances," Elsevier Scientific Publishing Co., New York (1973), Perry's Chemical Engineers Handbook, McGraw-Hill Book Company, CRC Handbook of Chemistry and Physics, Chemical Rubber Publishing Company (1986-1987), and Lange's Handbook of Chemistry, John A. Dean, editor, McGraw-Hill Book Company (1985). The true vapor pressure of a component in a solvent mix may be determined by ASTM Method D2879-86. The ROC composite partial pressure of a solvent mix consisting entirely of ROC may be determined by ASTM Method D2879-86.

d. Pursuant to Rule 74.6.G.6, the active and passive solvent losses from spray gun cleaning systems shall be determined using South Coast Air Quality Management District's "General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems" dated October 3, 1989. The test solvent for this determination shall be any lacquer thinner with a minimum vapor pressure of 105 mm Hg at 20°C. The minimum test temperature shall be 15°C.

e. Pursuant to Rule 74.6.G.7, initial boiling point of solvent shall be determined by ASTM 1078-78 or by using a published source such as listed in Rule 74.6.G.5.

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Ventura County Air Pollution Control District
Rule 74.10 Applicable Requirements
Components at Crude Oil and Natural Gas Production and Processing Facilities

Rule 74.10, "Components at Crude Oil and Natural Gas Production and Processing Facilities"
Adopted 03/10/98, Federally Enforceable

Applicability:

This attachment applies to the crude oil and gas production facilities, pipeline transfer stations, and to natural gas processing facilities, at this stationary source. This attachment summarizes the fugitive leak and leak inspection requirements of Rule 74.10.

A crude oil and gas production facility is defined as an onshore or offshore facility at which crude petroleum and natural gas production and handling are conducted, as defined in the SIC Code as Industry No. 1311, Crude Petroleum and Natural Gas. A pipeline transfer station is defined as a facility that handles the transfer or storage of crude oil in pipelines. A natural gas processing facility is defined as a facility engaged in the separation of natural gas liquids from field gas and/or fractionation of the liquids into natural gas products, such as ethane, propane, butane, and natural gasoline. Excluded from the definition are compressor stations, dehydration units, sweetening units, field treatment, underground storage facilities, liquefied natural gas units, and field gas gathering systems unless these facilities are located at a natural gas processing plant. This attachment does not apply to petroleum refineries.

Conditions:

1. Pursuant to Rule 74.10.B, the operator shall identify all leaking components that cannot be immediately repaired. This identification shall consist of readily visible labels, tags, or other such system approved by the APCO, in writing, that enables the District and the operator to locate and identify each leaking component. Identification tags and labels shall remain visible for at least one year from the date attached.

   As detailed in Rule 74.10.K.14, a leak is defined as any major gas leak, minor gas leak, major liquid leak or minor liquid leak. A leak is not a gaseous emission from a pneumatic control valve if it occurs when the valve is in the act of opening or closing. As detailed in Rule 74.10.K.3, a component is defined as any valve, stuffing box, dump lever arm, open ended line, fitting, pump seal, compressor seal, pressure relief valve, diaphragm, hatch, sight glass or meter. As detailed in Rule 74.10.K.16, a leak repair is any corrective action taken for the purposes of reducing a component leak to the lowest achievable level or at least below 1,000 ppmv for gas leaks and three drops per minute for liquid leaks using the best modern practices.

2. Pursuant to Rule 74.10.C.1, hatches shall be closed at all times except during sampling, adding of process material through the hatch, or attended maintenance operations.

3. Pursuant to Rule 74.10.C.2, no person shall use a component that emits a major gas leak, major liquid leak or minor liquid leak and the applicable maximum leak threshold for that component category, as listed in Attachment 1 of Rule 74.10, has been exceeded at the facility in any calendar quarter. The provisions of Rule 74.10.C.2 shall not apply to components that are tagged and repaired in accordance with Rules 74.10.D and 74.10.F.

   For the purpose of complying with the operating requirements in Rule 74.10.C.2, any fugitive emissions leak originating at a tank seam, broken pipe or any other nondesigned opening in a process unit shall be considered an "other component" leak for the purpose of Attachment 1 of Rule 74.10.

   A major gas leak, major liquid leak, and minor liquid leak are defined in Subsections K.17, K.18, and K.20 of Rule 74.10, respectively.

4. Pursuant to Rule 74.10.D.1, at natural gas processing plants, operators shall inspect with or without instrumentation all accessible operating pump seals, compressor seals, and pressure relief valves in service for leaks or indications of leaks once during every operating shift or every eight-hour period, whichever is greater.

5. Pursuant to Rule 74.10.D.2, at oil and gas production facilities and pipeline transfer stations, operators shall inspect with or without instrumentation all operating pump seals, compressor seals, pressure relief valves in service, and polished rod stuffing boxes for leaks or indications of leaks as follows:

   a. Inspection frequency at manned facilities shall be at least once per day except when operators do not report to work at a facility at any time during that day.

   b. Inspection frequency at unmanned facilities shall be at least once per week.

6. Pursuant to Rule 74.10.D.3, any gaseous leaks or indications of gaseous leaks discovered by inspection, that cannot be immediately repaired, shall be measured using EPA Method 21. The operator shall perform this leak measurement as follows:

   a. For leaks detected during normal business hours, the leak measurement shall be performed as soon as feasible but no later than 24 hours after detection. If this 24 hour deadline occurs on a weekend or holiday, then the deadline is shifted to the end of the next normal business day.

   b. For leaks detected during holidays, weekends or after business hours, the leak measurement shall be performed as soon as feasible but no later than the end of

the next normal business day.

7. Pursuant to Rule 74.10.D.4, immediately after being placed into service, an operator shall inspect all new, replaced or repaired fittings, including flanges and threaded connections, for leaks using EPA Method 21.

8. Pursuant to Rule 74.10.D.5, operators shall inspect all components, except for the following, at least every calendar quarter for gaseous leaks using EPA Method 21.

   a. Inaccessible components or unsafe to monitor components shall be inspected for leaks by the operator at least annually using EPA Method 21.

   b. Threaded connections and flanges shall be inspected for leaks by the operator using EPA Method 21 annually, unless the operator has designated them in the Operator Management Plan as exempt from all inspection requirements and subject to a zero leak threshold.

9. Pursuant to Rule 74.10.D.6, a pressure relief valve shall be inspected using EPA Method 21 within 3 calendar days after every known pressure release.

10. Pursuant to Rule 74.10.D.7, upon detection, operators shall affix a visible, weatherproof tag to all leaking components awaiting repair. The tag shall remain affixed until the component is repaired free of leaks as shown by re-inspection.

    If the leak is gaseous, the operator shall include the following on the tag: date and time of leak detection, date and time of leak measurement; and the concentration (ppmv) measured using EPA Method 21.

    If the leak is liquid, the operator shall include the following on the tag: date and time of leak detection; and whether leak is minor or major.

    A tag may also be some other system approved in writing by the APCO that demonstrates to District personnel that the operator has detected a component leak awaiting repair and contains all of the information required to be on tags by Rule 74.10.D.7.

11. Pursuant to Rule 74.10.D.8, notwithstanding the requirements of Rule 74.10.D.5, operators may inspect components annually instead of quarterly at a facility by satisfying all the following provisions, except that compressor seals, pressure relief valves, polished rod stuffing boxes, and pump seals shall not be eligible for this reduction in inspection frequency:

    a. During 4 consecutive calendar quarters, successfully operate and maintain all components at the facility so that no more than 0.5 percent of the total

components inspected, excluding polished rod stuffing boxes, have liquid leaks or major gas leaks that have not been immediately repaired.

b. A Notice of Violation from the District for a violation of Rule 74.10.C.2 was not received by the operator for the facility during the previous twelve months.

c. Submit a written request to the District for a reduction in inspection frequency. This request shall contain backup documentation including inspection reports that demonstrates that the above performance level in Rule 74.10.D.8.a has been achieved. Requests for a reduction in inspection frequency are not effective until written approval by the APCO is received by the operator.

12. Pursuant to Rule 74.10.D.9, an annual inspection frequency approved in Rule 74.10.D.8 shall revert to the inspection frequency specified in Rule 74.10.D.5 should the sum of liquid leaks and major gas leaks, not including leaks from polished rod stuffing boxes, exceed 0.5 percent of the total components inspected per inspection period or should the operator receive a Notice of Violation from the District for violation of Rule 74.10.C.2 for that facility.

13. Pursuant to Rule 74.10.E.1, each operator shall submit an Operator Management Plan to the APCO for approval. If the APCO fails to respond to the Plan in writing within 90 days after it has been received, then it shall be deemed approved. No provision in the Plan, approved or not, shall conflict with or take precedence over any provision of this rule. The Plan shall identify any component exempt from this rule or part of this rule, and describe the procedures which the operator intends to use to comply with the requirements of this rule. The Plan shall include:

a. Establishment of a data base of every leaking component that cannot be immediately repaired. The following parameters shall be included:

1) Identification number, name or code.

2) Component type, process unit and location.

3) Dates found leaking and repair description for each leak found.

This identification provision is for inspection, repair, replacement and recordkeeping purposes.

b. Identification of critical process units.

c. Identification of components for which exemption from Rule 74.10 is being claimed under Rule 74.10.G.1. Gaseous streams and liquid streams, exempted by

Rule 74.10, Subsections G.1.a, G.1.b, G.1.c, or G.1.e shall be verified by analysis of the ROC concentrations, and the results of such analyses shall be included.

d. Identification of liquid streams or components for which exemption is being claimed from the operator inspection requirements under Rule 74.10.G.3. The results of any testing used to qualify a stream for exemption shall be included.

e. Whether flanges or threaded fittings are exempt from all inspection requirements and subject to a zero leak threshold or whether flanges or threaded fittings are subject to annual inspection requirements and a one percent leak threshold as specified in Attachment 1 of Rule 74.10.

f. The inspection schedule to be followed.

g. Identification and description of any known hazard which may affect the safety of APCD personnel.

h. Identification of unmanned production facilities, if applicable.

14. Pursuant to Rule 74.10.E.2, the operator shall be required, upon written request by the APCO, to re-qualify, by analysis, the exemption(s) from the rule or part of the rule (Rule 74.10.G.1 and 74.10.G.3) if the exemption(s) may no longer be valid based on the changed composition of the process stream. The results of that analysis and any modification to the Plan shall be submitted to the District within 90 calendar days after receipt of the District request.

15. Pursuant to Rule 74.10.E.3, if the exempt status of a component is affected by a revision to Rule 74.10, then the Plan shall be modified accordingly by June 10, 1998.

16. Pursuant to Rule 74.10.E.4, existing operator management plans shall be updated no later than September 10, 1998, to include any provision that is needed to show compliance with Rule 74.10.

17. Pursuant to Rule 74.10.E.5, beginning September 10, 1998, each operator shall submit to the APCO, for approval in writing, an annual report to update the Operator Management Plan by no later than January 30 of each year. This report shall include any changes to exemptions, inspection schedule, or any other changes to the inspection and maintenance program. If no changes to the Plan have occurred over the past 12 months, then the operator shall indicate this in the annual report.

    If the APCO fails to respond to the Plan update in writing within 90 days after it has been received, then it shall be deemed approved. No provision in the Plan, approved or not, shall conflict with or take precedence over any provision of Rule 74.10.

18. Pursuant to Rule 74.10.F.1, the operator shall minimize all component leaks immediately if feasible but no later than 1 hour following detection during normal business hours. Component leaks detected during holidays, weekends and after business hours shall be immediately minimized if feasible but not later than the next normal business day.

19. Pursuant to Rule 74.10.F.2, any noncritical component found leaking shall be replaced or repaired to a leak free condition, within the time periods in Table 1 of Rule 74.10. For gaseous leaks, the repair period shall start at the time of leak measurement. For liquid leaks, the repair period shall start at the time of leak detection. If the Table 1 deadline for repairing any major gas leak or any liquid leak falls on a Saturday, Sunday or holiday, then the deadline shall be shifted to the next normal business day.

20. Pursuant to Rule 74.10.F.3, the operator shall re-inspect repaired or replaced components for leaks as soon as practicable using EPA Method 21, but not later than one calendar month after the date on which the component is repaired.

21. Pursuant to Rule 74.10.F.4, any component leak identified by District personnel shall be repaired and inspected as required by Rule 74.10.F.

22. Pursuant to Rule 74.10.F.5, any open-ended line found to be leaking shall be sealed with a blind flange, cap, plug, or a second closed valve at all times except during operations requiring process fluid flow through the open-ended line or valve. If a second closed valve is used, the process side valve shall be closed first, after the completion of any operations requiring flow through the open-ended valve.

23. Pursuant to Rule 74.10.F.6, for major gas leaks (>50,000 ppm) or major liquid leaks from any critical compressor seal, pump seal, pressure relief valve or valve that cannot be repaired within the repair periods set forth in Table 1 of Rule 74.10, the operator shall replace or retrofit the leaking component with Best Available Control Technology (BACT) equipment, as approved by the APCO in writing, within one year from the date of leak detection, or during the next critical process unit shutdown, whichever occurs first.

    For gas leaks less than or equal to 50,000 ppm or minor liquid leaks from critical components, or for leaks from critical components other than compressor seals, pump seals, pressure relief valves or valves, the owner or operator shall successfully repair or replace all leaking components within one year from leak detection or during the next critical process unit shutdown, whichever occurs first.

    The operator shall notify the District in writing within 3 months after detecting a major gas leak (> 50,000 ppm) or major liquid leak from a critical compressor seal, pump seal, pressure relief valve, or valve if such leak cannot be repaired within the repair periods set

forth in Table 1 of Rule 74.10.

24. Pursuant to Rule 74.10.F.7, for a compressor seal, pump seal, pressure relief valve or valve that emits a total of 5 major leaks within a continuous 12 month period, the operator shall replace or retrofit the leaking component with BACT equipment, as approved by the APCO in writing, within one year from date of leak detection. The operator shall notify the District in writing within 3 months after a compressor, pump, pressure relief valve, or valve has had 5 major leaks in the previous 12 months.

25. Pursuant to Rule 74.10.G.1, the requirements of Rule 74.10 shall not apply to the following components that are verified in the Operator Management Plan:

    a. Components, not at natural gas processing plants, with gaseous streams with ROC concentrations of 10 percent, by weight or less.

    b. Components at natural gas processing plants with gaseous streams with ROC concentrations of one percent, by weight or less.

    c. Components, not at natural gas processing plants, in liquid service, with ROC concentrations of 10 percent, by weight or less.

    d. Underground components.

    e. Components exclusively handling fluids if the fluid weight evaporated is 10 percent or less at 150 degrees Celsius.

26. Pursuant to Rule 74.10.G.2, the operator inspection requirements of Rule 74.10.D shall not apply to the following components. All other requirements of this rule shall still apply.

    a. Pump seals, compressor seals, and pressure relief valves that are equipped with a closed-vent system to a vapor recovery system. The vapor disposal portion of the vapor recovery system shall consist of one of the following:

        1) A system which directs all vapors to a fuel gas system, a sales gas system, or a flare that combusts ROC.

        2) Any other system that processes all vapors and has a ROC vapor destruction or removal efficiency of at least 90 percent, by weight.

    b. One-half inch and smaller stainless steel tube fittings that have been determined to be leak-free.

c. Components in vacuum service.

d. Flanges or threaded connections that are designated in the Operator Management Plan as subject to the zero leak threshold specified in Attachment 1 of Rule 74.10.

27. Pursuant to Rule 74.10.G.3, the operator inspection requirements of Rule 74.10, Subsections D.1, D.2, D.4 and D.5 shall not apply to components that are inspected with or without instrumentation on a quarterly basis and are at oil and gas production facilities or pipeline transfer stations that handle liquids with the following properties and specified vapor recovery systems:

a. Liquid having an API gravity of 20 degrees or less after the point of primary separation;

b. Liquid having an API gravity between 20 and 30 degrees which are located either:

1) Downstream of a wellhead equipped with a casing vapor recovery system, provided that the vapor recovery system is operated at a pressure of less than 10 psig; or

2) After the point of primary separation of oil and gas, provided the separation vessel is equipped with a vapor recovery system and is operated at a pressure of less than 25 psig.

28. Pursuant to Rule 74.10.G.4, an owner or operator may petition the APCO for exemption from the replacement or retrofit requirements in Rules 74.10.F.6 and 74.10.F.7 by submitting a cost evaluation for retrofitting or replacing a compressor, pump, pressure relief valve, or valve. Each petition shall include:

a. A cost-effectiveness evaluation conducted in accordance with "BACT Cost-Effectiveness Procedures and Screening Levels for Costs," adopted by the Air Pollution Control Board on December 20, 1988. The cost analysis shall be based on the retrofit cost of the component if a retrofit is feasible. If the component cannot be retrofitted, then the following control option with the lower cost shall be used in the cost analysis:

1) Component replacement with the lowest feasible cost BACT option.

2) Enclosing the component seal and venting to a vapor recovery system.

b. Evidence of costs with written bids from vendors, published price lists, or other verifiable cost information. The potential emission reduction from the component retrofit/replacement shall be based on the ROC emissions over the previous 12

months. ROC emissions from a critical process unit shutdown shall be included if those emissions are associated with a critical leaking component. APCO-approved emission factors or source tests shall be used to quantify emissions.

29. Pursuant to Rule 74.10.H.1, any person subject to Rule 74.10 shall maintain an inspection log. The inspection log shall contain at least the following:

    a. Location, type, description, and name or code of each leaking component inspected that cannot be immediately repaired, and name of associated operating unit.

    b. For liquid leaks that cannot be immediately repaired: Date and time of leak detection and whether leak is major or minor.

    c. For gaseous leaks that cannot be immediately repaired: Date and time of leak detection, date and time of leak measurement, analyzer reading (ppmv) of the leak, and whether the leak is major or minor.

    d. Date that leak referenced in Rule 74.10.H.1.b or Rule 74.10.H.1.c is repaired to a leak-free condition, description of repair action, and date and emission level of re-check.

    e. Identification of leak as critical if the component is critical.

    f. Maintenance and calibration records of appropriate analyzer used in the EPA Method 21 measurements.

30. Pursuant to Rule 74.10.H.2, where a functional pressure relief has been detected, the operator shall record:

    a. Location, operating unit identification, and date of detection.

    b. Date of inspection of the pressure relief device after it was detected, and analyzer reading from EPA Method 21.

31. Pursuant to Rules 74.10.H.3 and 74.10.H.4, the inspection log shall be retained by the operator and shall be made available upon request to District personnel.

32. Pursuant to Rule 74.10.I.1, gaseous leaks from components shall be inspected or determined by EPA Method 21 by using an appropriate analyzer calibrated with methane. The calibration, maintenance, and operation of the appropriate analyzer shall follow the manufacturer's recommendations.

33. Pursuant to Rule 74.10.I.2, the ROC concentration, by weight, of process streams shall be measured by ASTM E168-88 (General Techniques of Infrared Qualitative Analysis), ASTM E169-87 (General Techniques of Ultraviolet Quantitative Analysis), or ASTM E260-85 (Gas Chromatography), or updated versions of these methods approved by EPA and published in the 40 CFR Part 60.

34. Pursuant to Rule 74.10.I.3, weight percentage of evaporated compounds of liquids shall be determined using ASTM Method D 86-82.

35. Pursuant to Rule 74.10.I.4, the API gravity of crude oil shall be determined using ASTM Method D287.

36. Pursuant to Rule 74.10.J, the failure of a person to meet any requirements of Rule 74.10 shall constitute a violation of Rule 74.10. Each leak exceeding the applicable maximum leak threshold in Attachment 1 of Rule 74.10 discovered by District personnel will be considered to be a violation.

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Ventura County Air Pollution Control District
Rule 74.11.1 Applicable Requirements
Rule 74.11.1, Large Water Heaters and Small Boilers

Rule 74.11.1, "Large Water Heaters and Small Boilers"
Federally Enforceable Version Adopted 09/14/99
District Enforceable Version Adopted 09/11/12

This permit attachment lists the requirements of the September 11, 2012 version of the rule. Compliance with this attachment will ensure compliance with both versions of Rule 74.11.1. The permit conditions below, therefore, are federally enforceable. The District-enforceable version of this rule will become federally enforceable when approved by the EPA as part of the SIP.

Applicability:

This attachment applies to all natural gas-fired water heaters, boilers, steam generators or process heaters (units) with a rated heat input capacity greater than or equal to 75,000 BTU/hr and less than 1,000,000 BTU/hr at this stationary source installed after January 1, 2013 and to the future installation of any such unit at this stationary source.

Conditions:

1. Pursuant to Rule 74.11.1.B.1, until January 1, 2014, no person shall sell, offer for sale, or install in Ventura County any new unit with a rated heat input capacity of greater than or equal to 75,000 BTU/hr and less than or equal to 400,000 BTU/hr that does not meet the following criteria:

    a. Oxides of nitrogen emissions shall not exceed 40 nanograms per joule of heat output (93 pounds per billion BTU), or 55 parts per million, and

    b. The unit is certified in accordance with Rule 74.11.1.C.

2. Pursuant to Rule 74.11.1.B.2, after January 1, 2014, no person shall sell, offer for sale, or install in Ventura County any new unit with a rated heat input capacity of greater than or equal to 75,000 BTU/hr and less than or equal to 400,000 BTU/hr that does not meet the following criteria:

    a. Oxides of nitrogen emissions shall not exceed 14 nanograms per joule of heat output (32.5 pounds per billion BTU), or 20 parts per million, and

    b. The unit is certified in accordance with Rule 74.11.1.C.

The oxides of nitrogen emission standard required above (Condition No. 2.a) does not apply to units specifically designed to heat swimming pools, hot tubs, or spas. For such units, oxides of nitrogen emissions shall not exceed 40 nanograms per joule of heat output (93 pounds per billion BTU), or 55 parts per million.

3. Pursuant to Rule 74.11.1.B.3, no person shall sell, offer for sale, or install in Ventura County any new unit with a rated heat input capacity of greater than 400,000 BTU/hr and less than or equal to 1,000,000 BTU/hr that does not meet the following criteria:

   a. Oxides of nitrogen emissions shall not exceed 20 parts per million and carbon monoxide emissions shall not exceed 400 parts per million, and

   b. The unit is certified in accordance with Rule 74.11.1.C.

4. The permittee shall maintain a listing of manufacturer, brand name, model number, heat input rating, and installation date for each water heater, boiler, steam generator and process heater, with a rated heat input capacity greater than or equal to 75,000 BTU/hr and less than 1,000,000 BTU/hr, at this stationary source. Permittee shall submit these identification records for all of these units to the District upon request.

5. On an annual basis, the permittee shall certify that all water heaters, boilers, steam generators and process heaters, with a rated heat input capacity greater than or equal to 75,000 BTU/hr and less than 1,000,000 BTU/hr, at this stationary source are complying with Rule 74.11.1. This annual certification shall include a formal survey identifying each unit and documentation of certification status (pursuant to Rule 74.11.1.C), as required.

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Ventura County Air Pollution Control District
Rule 74.22 Applicable Requirements
Rule 74.22, Natural Gas-Fired Fan-Type Central Furnaces

Rule 74.22, "Natural Gas-Fired Fan-Type Central Furnaces"
Adopted 11/09/93, Federally-Enforceable

Applicability:

This attachment applies to all natural gas-fired, fan-type central furnaces at this stationary source installed after May 31, 1994 and to the future installation of any natural gas-fired, fan-type central furnaces at this stationary source. A fan-type central furnace is a self contained space heater providing for circulation of heated air at pressures other than atmospheric through ducts of more than 10 inches in length that has a rated heat input capacity of less than 175,000 BTU per hour and, for combination heating and cooling units, a rated cooling capacity of less than 65,000 BTU per hour. Natural gas-fired, fan-type central furnaces installed in manufactured housing (mobile homes) are exempt from Rule 74.22.

Conditions:

1. Pursuant to Rule 74.22.B, no person shall install, after May 31, 1994, any natural gas-fired fan-type central furnace:

   a. with NOx (oxides of nitrogen) emissions in excess of 40 nanograms per joule of heat output. (74.22.B.1)

   b. unless it is certified and identified in accordance with Section C of Rule 74.22. (74.22.B.2)

2. Permittee shall maintain a listing of manufacturer, brand name, model number, and heat input rating for each natural gas-fired fan-type central furnace at this stationary source. Permittee shall submit these identification records for all of these furnaces to the District upon request.

3. On an annual basis, permittee shall certify that all natural gas-fired fan-type central furnaces at this stationary source are complying with Rule 74.22. This annual certification shall include a formal survey identifying each natural gas-fired fan-type central furnace; whether it was installed before or after May 31, 1994; and for those furnaces installed after May 31, 1994, information indicating that the certification is contained on the furnace nameplate, or that the furnace is included on a District-provided list of certified furnaces.

10. GENERAL REQUIREMENTS FOR SHORT-TERM ACTIVITIES (ATTACHMENTS)

The general requirements for short-term activities are broadly applicable requirements that apply to temporary activities at the facility (e.g., abrasive blasting, architectural coatings, degassing operations, etc.). These are activities occurring infrequently and for a short duration. Requirements for short-term activities can normally be adequately addressed in the permit application with minimal or no reference to any specific emissions unit, provided that the scope of the requirement and the manner of its enforcement are clear.

As detailed in the Title V Permit Reissuance Application, general applicable requirements for short-term activities that apply to this facility were determined. The permit conditions associated with each requirement for a short-term activity are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No.) ____" or "Attachment 40CFR61.M" in the lower left corner of each attachment.

Ventura County Air Pollution Control District
Rule 74.1 Applicable Requirements
Abrasive Blasting

Rule 74.1, "Abrasive Blasting"
Adopted 11/12/91, Federally-Enforceable

Applicability:

This attachment applies to short term activities involving any abrasive blasting operation conducted at this facility. Abrasive blasting is the operation of cleaning or preparing a surface by forcibly propelling a stream of abrasive material against that surface. Abrasive materials subject to Rule 74.1 include, but are not limited to, sand, slag, steel shot, garnet or walnut shells.

Conditions:

1. Pursuant to Rule 74.1.B.1.a, all abrasive blasting operations shall be conducted within a permanent building, except for abrasive blasting operations conducted under one or more of the following conditions as detailed in Rule 74.1.B.1.b:

    a. Steel or iron shot/grit is used exclusively

    b. The item to be blasted exceeds eight feet in any dimension

    c. The surface being blasted is situated at its permanent location or no further away from its permanent location than is necessary to allow the surface to be blasted

2. Pursuant to Rule 74.1.B.1.c, any abrasive blasting that is allowed to be conducted outside of a permanent building, and is not exclusively using steel or iron shot/grit, must use one of the following:

    a. Wet abrasive blasting

    b. Hydroblasting

    c. Vacuum blasting

    d. Dry blasting with California ARB certified abrasives

3. Abrasive blasting for pavement marking shall comply with the requirements of Rule 74.1.B.2.

4. Abrasive blasting of stucco and concrete shall comply with the requirements of Rule 74.1.B.3.

5. Packages or containers for abrasives certified in accordance with Section 92530 of the California Code of Regulations used for permissible outdoor blasting shall comply with the labeling requirements of Rule 74.1.B.4.

6. Abrasive blasting operations shall comply with the visible emission standards of Rule 74.1.C.1 and the nuisance prohibition of Rule 74.1.C.2. The visible emission evaluation of abrasive blasting operations shall be conducted in accordance with Section 92400 of the California Code of Regulations.

7. Permittee shall perform routine surveillance and visual inspections of the abrasive blasting operation to ensure that compliance with Rule 74.1 is being maintained. This routine surveillance shall include assuring that operation and equipment requirements are being met, and that there are no opacity violations.

   In addition, for each abrasive blasting operation conducted at the facility, permittee shall maintain records of the following information:

   a. Date of operation

   b. Type of abrasive blasting media used

   c. Identity, size, and location of item blasted

   d. Whether operation was conducted inside or outside a permanent building

   e. California ARB certifications for abrasives used

   These records shall be maintained at the facility and submitted to the District upon request.

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Ventura County Air Pollution Control District
Rule 74.2 Applicable Requirements
Architectural Coatings

Rule 74.2, "Architectural Coatings"
Adopted 01/12/10, Federally-Enforceable

Applicability:

This attachment applies to short term activities involving any person who supplies, sells, offers for sale, applies or solicits the application of any architectural coating at this stationary source. An architectural coating is a coating to be applied to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. Coatings applied in shop applications or to nonstationary structures, such as airplanes, ships, boats, railcars and automobiles, are not considered to be architectural coatings for the purposes of this rule, nor are adhesives.

This attachment and Rule 74.2 do not apply to architectural coatings that are sold in a container with a volume of one liter (1.057 quart) or less and do not apply to any aerosol coating product.

Conditions:

1. Pursuant to Rule 74.2.B.1, the volatile organic compound (VOC) content of architectural coatings shall not exceed the following standards, as found in Table 2 of Rule 74.2.B.1, unless specifically exempted by Rule 74.2:

    a. The VOC content of flat coatings shall not exceed 100 grams per liter of coating. Effective January 1, 2012, this limit is reduced to 50 grams per liter of coating.

    b. The VOC content of nonflat coatings shall not exceed 100 grams per liter of coating.

    c. The VOC content of nonflat-high gloss coatings shall not exceed 150 grams per liter of coating.

    Limits are expressed as VOC Regulatory (unless otherwise specified in Rule 74.2) thinned to the manufacturer's maximum recommendation, excluding colorant added to the tint bases. VOC Regulatory is defined in Rule 74.2.

2. Pursuant to Rule 74.2.B.1, the VOC content of specialty architectural coatings shall not exceed the VOC limits in the Table of Standards in Rule 74.2, unless specifically exempted by Rule 74.2.

    Specifically, the VOC content of industrial maintenance coatings shall not exceed 250 grams per liter of coating.

Limits are expressed as VOC Regulatory (unless otherwise specified in Rule 74.2) thinned to the manufacturer's maximum recommendation, excluding colorant added to the tint bases. VOC Regulatory is defined in Rule 74.2.

3. Pursuant to Rule 74.2.B.4, all architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC-containing materials used for thinning and cleanup shall also be closed when not in use.

4. Pursuant to Rule 74.2.B.5, no person who applies or solicits the application of any architectural coating shall apply or solicit the application of any coating that is thinned to exceed the applicable VOC limit specified in the Tables in Subsection B.1.

5. Permittee shall perform routine surveillance of the architectural coating operation to ensure that compliance with Rule 74.2 is being maintained. Permittee shall specify the usage of compliant coatings and shall maintain VOC records of coatings used at the stationary source. This information shall be submitted to the District upon request.

6. The VOC content of architectural coatings, along with other specified physical and chemical properties, shall be measured using the testing procedures in Rule 74.2.G.

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Ventura County Air Pollution Control District
Rule 74.16 Applicable Requirements
Oilfield Drilling Operations on Platform Grace

Rule 74.16, "Oilfield Drilling Operations"
Adopted 01/08/91, Federally-Enforceable

Applicability:

This attachment applies to short term activities involving oilfield drilling operations on Platform Grace. Oilfield drilling operations are defined as activities powered by nonvehicular internal combustion engines for the purpose of drilling or redrilling oil wells, injection wells, or gas wells. For the purpose of Rule 74.16, drilling operations do not include any operations at any existing well where the derrick is a part of an oilwell production service unit, as defined in the California Vehicle Code. Rule 74.16 applies to drill rig engines over 50 HP including, but not limited to, engines supplying power to drawworks, rotary tables, mud pumps, mud mixers and auxiliary generators.

This attachment applies to an oil company, which Rule 74.16 defines as the person contracting the drilling rig and/or the person who applies for an Authority to Construct for the well. The APCD issues portable Permits to Operate to the owners of drilling rigs. The California Air Resources Board Portable Equipment Registration (PERP) is not valid on an OCS platform; therefore, an APCD Permit to Operate is required for drilling rig engines.

This permit does not authorize the operation of any non-vehicular engine of 50 BHP, or greater, for well drilling or workover operations. Prior to using such an engine, the engine owner shall obtain a Permit to Operate for the engine, unless the engine qualifies for an exemption from the requirement to obtain a Permit to Operate under District regulations. A portable engine used to power an emergency drilling generator that is used only when electrical power line fails is exempt from permit pursuant to Rule 23.D.7.

Conditions:

1. Pursuant to Rule 74.16.B.1, all drilling operations shall be powered by grid power, unless exempted by Rule 74.16.C.1. Grid power is defined as electricity conveyed by power lines connected physically and contractually to the Southern California Edison System, or any electricity generated by equipment permitted by the District and having permitted emissions commensurate with an emissions rate of not more than 1.0 pound of NOx per megawatt-hour of electricity produced.

2. The District has concluded that it would not be cost effective to run grid power to Platform Grace. Authority to Construct No. 01493-300 (issued November 11, 2005) was granted for three 915 BHP Caterpillar rich burn natural gas fired engines to be used for

electricity generation for drilling. The permitted emissions of NOx from these engines are less than 515 ppmv corrected to 15% oxygen. Therefore, pursuant to Rule 74.16.C.1, the Caterpillar engines may be used to supply electrical power during drilling operations in order to comply with Rule 74.16.B.2.a.

3. If the permittee elects to use drilling engines in place of the 915 BHP Caterpillar engines, then the following conditions apply:

   a. Pursuant to Rule 74.16.B.2.a, NOx emissions from these drilling engines, or any exhaust stack of multiple engines permanently manifolded together, shall not exceed 515 ppmv corrected to 15% oxygen. As an alternate, pursuant to Rule 74.16.B.2.c, drilling engines certified by the manufacturer to emit 6.9 grams of NOx per brake horsepower-hour or less based on a California ARB approved heavy duty offroad engine testing procedure shall be deemed in compliance with Rule 74.16.B.2.a, and shall not be subject to the annual source test requirements in Rule 74.16.B.2.b.

      In order to comply with this condition, permittee shall ensure that the drilling engine utilized has a valid APCD Permit to Operate and that the drilling engine has demonstrated compliance with Rule 74.16.B.2.a in accordance with CARB Method 100 as detailed in Rule 74.16.E (Test Methods), or has demonstrated compliance with Rule 74.16.B.2.c.

   b. In order to demonstrate compliance with Rule 74.16.B.2.a, the drilling rig company shall perform source testing on the drilling engine exhaust annually. Permittee shall obtain from the drilling rig company the most recent source test results for the engines subject to Rule 74.16.B.2.a, or the engine manufacturer certification for engines subject to Rule 74.16.B.2.c. This information shall be made available on site and submitted to the District upon request.

   c. Upon District request, the NOx emissions from the drilling engine exhaust shall be measured using CARB Method 100, in accordance with Rule 74.16.E (Test Methods).

Ventura County Air Pollution Control District
40 CFR Part 61, Subpart M Applicable Requirements
National Emission Standard for Asbestos

40 CFR Part 61, Subpart M, "National Emission Standard for Asbestos"
Federally-Enforceable

Applicability:

This attachment applies to short term activities conducted at this facility pertaining to procedures for asbestos demolition or renovation activities as detailed in 40 CFR Part 61.145.

As defined in 40 CFR Part 61.141, asbestos means the asbestiform varieties of serpentinite (chrysotile), riebeckite (crocidolite), cummingtonite-grunerite, anthophyllite, and actinolite-tremolite. Renovation means altering a facility or one or more facility components in any way, including the stripping or removal of regulated asbestos containing material (RACM) from a facility component. Operations in which load-supporting structural members are wrecked or taken out are demolitions.

Conditions:

1. Permittee shall insure compliance with 40 CFR Part 61 Subpart M, "National Emission Standard for Asbestos". The owner or operator of a demolition or renovation activity, as defined in 40 CFR Part 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR Part 61.145, "Standards for Demolition and Renovation".

2. During times when asbestos renovation or demolition are underway at the facility, permittee shall ensure that all applicable requirements of 40 CFR Part 61.145 are met.

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11. GENERAL PERMIT CONDITIONS

This section contains general Part 70 permit conditions and general APCD permit to operate conditions. The general Part 70 permit conditions are associated with general federal requirements that apply to all Title V facilities. These conditions are based on APCD Rules 8, 30, 32, and 33, and 40 CFR Part 70.

The general permit to operate conditions are associated with general District requirements that apply to all operating Title V facilities. These conditions are based on APCD Rules 19, 20, 22, and 27.

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Ventura County Air Pollution Control District
General Part 70 Permit Conditions

1. The permittee shall comply with all federally-enforceable conditions of the Part 70 permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of an application for reissuance of the permit. (40 CFR 70.6(a)(6)(i), APCD Rule 33.3.B.1)

2. The permittee shall continue to comply with all the applicable requirements with which the company has certified that it is already in compliance. The permittee shall comply in a timely manner with applicable requirements that become effective during the permit term of this permit.

3. The permittee shall promptly report deviations from Part 70 permit requirements, including those attributable to upset conditions as defined in the Part 70 permit, the probable cause of the deviations, and any corrective actions or preventive measures taken. Promptly is defined as no later than four (4) hours after its detection by such owner or operator, or his agents or employees. (40 CFR 70.6(a)(3)(iii)(B), APCD Rule 33.3.A.3, APCD Rule 32.B.1)

4. The need to halt or reduce activity is not a defense. It shall not be a defense for a permittee in an enforcement action that it would be necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Part 70 permit. (40 CFR 70.6(a)(6)(ii), APCD Rule 33.3.B.2)

5. All required records, monitoring data, and support information shall be maintained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 permit. All applicable reports shall be submitted to the District every 6 months and shall be certified by a responsible official. Such reports shall identify any deviations from Part 70 permit conditions. (40 CFR 70.6(a)(3)(ii)(B), 40 CFR 70.6(a)(3)(iii)(A), APCD Rule 33.3.A.3)

6. The permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 permit or to determine compliance with the Part 70 permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the Part 70 permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of the EPA along with a claim of confidentiality. (40 CFR 70.6(a)(6)(v), APCD Rule 33.3.B.5)

7. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the District or an authorized representative to perform the following:

   a. Enter upon the permittee's premises where a Part 70 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the Part 70 permit;

   b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the Part 70 permit;

   c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the Part 70 permit; and

   d. As authorized by the federal Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the Part 70 permit or applicable requirements.

   (40 CFR 70.6(c)(2), APCD Rule 8, APCD Rule 33.3.B.7)

8. The Part 70 permit may be modified, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (40 CFR 70.6(a)(6)(iii), APCD Rule 33.3.B.3)

9. A Part 70 permit shall be reopened under the following conditions:

   a. Additional applicable requirements under the federal Clean Air Act become applicable to the facility with a remaining Part 70 permit term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the Part 70 permit is due to expire, unless the original Part 70 permit or any of its terms and conditions has been extended pursuant to APCD Rule 33.6.D;

   b. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator of the EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 permit;

c. The District or EPA determines that the Part 70 permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 permit; or

d. The Administrator of the EPA or the District determines that the Part 70 permit must be revised or revoked to assure compliance with the applicable requirements.

(40 CFR 70.7(f), APCD Rule 33.8.A)

10. All fees required by District Regulation III, Fees, shall be paid on a timely basis as requested by the District. Notwithstanding the term of the Part 70 permit, if the permittee fails to pay the annual renewal fees required pursuant to APCD Rule 42.H within the time period specified in APCD Rule 30, the Part 70 permit will be void. (40 CFR 70.6(a)(7), APCD Rule 30, APCD Rule 33.3.B.6)

11. The Part 70 permit does not convey any property rights of any sort, or any exclusive privilege. (40 CFR 70.6(a)(6)(iv), APCD Rule 33.3.B.4)

12. The provisions of this Part 70 permit shall be severable, and in the event of any challenge to any portion of the permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force. (40 CFR 70.6(a)(5), APCD Rule 33.3.B.8)

13. An application for reissuance of this Part 70 Permit shall be submitted no more than 18 months prior to the expiration date and no less than 6 months prior to the expiration date as stated on this permit. The application shall be subject to the same procedural requirements, including those for public participation and EPA review, that apply to initial Part 70 permit issuance. (40 CFR 70.5(a)(1)(iii), 40 CFR 70.7(c)(1)(i), APCD Rule 33.6.B)

14. Any Part 70 application and any document, including reports, schedule of compliance progress reports, and compliance certification, required by this Part 70 permit shall be certified by a responsible official. The certification shall state that, based on information and belief formed after a reasonable inquiry, the statements and information in the document are true, accurate, and complete (40 CFR 70.5(d), APCD Rule 33.9.C)

15. Permittee shall submit a certification of compliance with all applicable requirements and all Part 70 permit conditions. A compliance certification shall be submitted with any Part 70 permit application and annually, on the anniversary date of the Part 70 permit, or on a more frequent schedule if required by an applicable requirement or permit condition.

    This compliance certification shall identify each applicable requirement or condition of the Part 70 permit, the compliance status of the stationary source, whether the compliance was continuous or intermittent since the last certification, and the method(s) used to

determine compliance. In addition, the certification shall indicate the stationary source's compliance status with any applicable enhanced monitoring and compliance certification requirement of the federal Clean Air Act. A copy of each compliance certification shall be submitted to EPA Region IX. (40 CFR 70.5(c)(9), 40 CFR 70.6(c)(5), APCD Rule 33.3.A.9, APCD Rule 33.9.B)

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Ventura County Air Pollution Control District
General Permit to Operate Conditions

1. Within 30 days after receipt of a permit to operate, the permittee may petition the Hearing Board, in writing, to review any new or modified condition on the permit. (APCD Rule 22)

2. This permit to operate, or a copy, shall be posted reasonably close to the subject equipment and shall be readily accessible to inspection personnel from the District. Posting a copy of the "Permitted Equipment and Applicable Requirements Table" contained in Section No. 2 will fulfill this requirement if the entire permit to operate is readily available at another location at the stationary source. (APCD Rule 19)

3. This permit to operate is not transferable from one location to another unless the equipment is specifically listed as being portable. (APCD Rule 20)

4. If, within a reasonable amount of time, any permittee refuses to furnish information requested by the District, the District may suspend this permit to operate The permittee will be informed, in writing, of the permit suspension and the reasons for the suspension. (APCD Rule 27)

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12. MISCELLANEOUS FEDERAL PROGRAM CONDITIONS

This section contains miscellaneous federal program conditions that are not emission unit-specific or short-term. These federal requirements are broadly applicable requirements that apply and are enforced in the same manner for all subject emissions units or short-term activities. Permit conditions associated with these miscellaneous federal program requirements are listed in an individual attachments. The attachment is identified with the label "Attachment 40CFR(Part No.) __" in the lower left corner of each attachment.

Ventura County Air Pollution Control District
40 CFR Part 55 Applicable Requirements
Outer Continental Shelf Air Regulations

40 CFR Part 55, "Outer Continental Shelf Air Regulations"
Federally-Enforceable

Applicability:

This attachment applies to the stationary source since it is an existing outer continental shelf (OCS) source. 40 CFR Part 55 and related consistency updates detail the District rules that apply to OCS sources. Attachments contained in this permit use the term "Federally-Enforceable OCS Version" to designate those rules that are federally-enforceable at OCS sources via 40 CFR Part 55.

Conditions:

1. Permittee shall comply with 40 CFR Part 55, "Outer Continental Shelf Air Regulations". Permittee shall also comply with Rule 72.1, "Outer Continental Shelf Air Regulations". Rule 72.1 incorporates the following provisions of 40 CFR Part 55:

Section 55.1	Statutory authority and scope
Section 55.2	Definitions
Section 55.3	Applicability
Section 55.4	Requirement to submit a notice of intent
Section 55.5	Corresponding onshore area designation
Section 55.6	Permit requirements
Section 55.7	Exemptions
Section 55.8	Monitoring, reporting, inspections, and compliance
Section 55.9	Enforcement
Section 55.10	Fees
Section 55.13	Federal requirements that apply to OCS sources
Section 55.14 a,b,c	Requirements that apply to OCS sources located within 25 miles of states' seaward boundaries, by state

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Ventura County Air Pollution Control District
40 CFR Part 68 Applicable Requirements
Accidental Release Prevention and Risk Management Plans

40 CFR Part 68, "List of Regulated Substances and Thresholds for Accidental Release Prevention"
Federally-Enforceable

Applicability:

This attachment applies to regulated substances that are contained in a process at this facility and that exceed the threshold quantity, as presented in 40 CFR Part 68.130. This regulation addresses the requirements of section 112(r) of the federal Clean Air Act as amended. Specifically, this attachment applies to a facility that has stated that a federal Risk Management Plan pursuant to section 112(r) is currently not required, but where flexibility is desired to preclude a permit reopening should 40 CFR Part 68 become an applicable requirement.

Conditions:

1. Should the stationary source, as defined in 40 CFR Part 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in Part 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70.

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Ventura County Air Pollution Control District
40 CFR Part 82 Applicable Requirements
Protection of Stratospheric Ozone

40 CFR Part 82, "Protection of Stratospheric Ozone"
40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners"
40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction"
Federally-Enforceable

Applicability:

This attachment applies to activities conducted at this facility that involve producing, importing, exporting, or consuming of the specified controlled substances described under 40 CFR Part 82.4. Specifically, this attachment includes the requirements of 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners", and 40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction".

As defined in 40 CFR Part 82.30, 40 CFR Part 82, Subpart B applies to any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner.

As defined in 40 CFR Part 82.150, 40 CFR Part 82, Subpart F applies to any person servicing, maintaining or repairing appliances, except for motor vehicle air conditioners. This subpart also applies to persons disposing of appliances, including motor vehicle air conditioners An appliance is any device which uses a class I or class II substance as a refrigerant and which is used for household or commercial purposes, including any air conditioner, refrigerator, chiller, or freezer.

Conditions:

1. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners".

   The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

2. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee is subject to all of the applicable requirements as specified in 40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction".

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Ventura County Air Pollution Control District
Standards of Performance (NSPS) for
Crude Oil and Natural Gas Production, Transmission and Distribution

40 CFR Part 60, Subpart OOOO, "Standards of Performance (NSPS) for Crude Oil and Natural Gas Production, Transmission and Distribution"

Applicability:

This NSPS applies to all well completions, pneumatic controllers, equipment leaks from natural gas processing plants, reciprocating compressors, centrifugal compressors and storage vessels which are constructed, modified or reconstructed after August 23, 2011 as discussed in more detail below. Well completions subject to the NSPS are limited to the flowback period following hydraulic fracturing operations at an applicable gas well. These applicable completions include those conducted at newly drilled and fractured gas wells, as well as completions conducted following refracturing operations that may occur at various times over the life of the gas well. When a gas well is refractured, the applicability of this NSPS does not by itself trigger applicability beyond the well head to other ancillary components that may be at the well site such as existing storage vessels, compressors, pneumatic controllers, process vessels, separators, dehydrators or any other components or apparatus. Note that the NSPS does not apply to gas wells located on offshore oil platforms in Ventura County. This document summarizes the requirements of the NSPS and is not intended to supersede or conflict with the requirements of the NSPS.

Note that the issuance of this NSPS now includes, incorporates, and / or revises the requirements of 40 CFR Part 60 Subpart KKK, "Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants", and 40 CFR Part 60 Subpart LLL, "Standards of Performance for Onshore Natural Gas Processing: SO2 Emissions". These NSPS now each have sunset dates of August 23, 2011 and their requirements are now contained in 40 CFR Part 60, Subpart OOOO, "Standards of Performance (NSPS) for Crude Oil and Natural Gas Production, Transmission and Distribution".

Conditions:

1. Gas wells undergoing hydraulic fracturing subject to this NSPS shall comply with Section 60.5375. A gas well or natural gas well is defined as an onshore well drilled principally for production of natural gas. In general, the NSPS requires the use of reduced emissions completions (REC) also known as green completions.

   The drilling of all new oil wells and all new gas wells requires a Ventura County APCD Authority to Construct. In addition, an Authority to Construct shall be obtained prior to refracturing an existing gas well.

2. Centrifugal compressors subject to this NSPS shall comply with Section 60.5380. A centrifugal compressor is defined as any machine for raising the pressure of a natural gas by drawing in low pressure natural gas and discharging significantly higher pressure natural gas by means of mechanical rotating vanes or impellers. Screw, sliding vane, and liquid ring compressors are not centrifugal compressors as defined in this NSPS. In general, the NSPS requires the operators of affected centrifugal compressors to reduce VOC emissions from each centrifugal compressor wet seal fluid degassing system by 95.0 percent or greater. Compressors located at the wellhead or in the transmission, storage and distribution segments are not covered by this NSPS.

   The Ventura County APCD does not require permits for natural gas compressors, but does require permits for an internal combustion engine (in lieu of an electric motor) powering a natural gas compressor. Therefore, this condition authorizes the installation of the equipment necessary to comply with these centrifugal compressor requirements provided that the permittee comply with all the requirements of Section 60.5380, including the required notification, recordkeeping and reporting requirements.

3. Reciprocating compressors subject to this NSPS shall comply with Section 60.5385. A reciprocating compressor is defined as a piece of equipment that increases the pressure of a process gas by positive displacement, employing linear movement of a drive shaft. In general, the NSPS requires the operators of affected reciprocating compressors to replace the rod packing every 26,000 hours or 36 months from the date of initial startup of the reciprocating compressor affected facility. Compressors located at the wellhead or in the transmission, storage and distribution segments are not covered by this NSPS.

   The Ventura County APCD does not require permits for natural gas compressors, but does require permits for an internal combustion engine (in lieu of an electric motor) powering a natural gas compressor. Therefore, this condition authorizes the work necessary to comply with these reciprocating compressor requirements provided that the permittee comply with all the requirements of Section 60.5385, including the required notification, recordkeeping and reporting requirements.

4. Pneumatic controllers subject to this NSPS shall comply with Section 60.5390. A pneumatic controller is defined as an automated instrument used for maintaining a process condition such as liquid level, pressure, delta-pressure and temperature. The requirements apply to pneumatic controllers located (a) in the oil production segment between the wellhead and the point of custody transfer to an oil pipeline; or (b) in the natural gas production segment between the wellhead and the point at which the gas enters the transmission and storage segment. In general, this NSPS requires each pneumatic controller affected facility at a natural gas processing plant to have a natural gas bleed rate of zero standard cubic feet per hour. Each pneumatic controller affected facility between the wellhead and a natural gas processing plant must have a natural gas bleed rate of less than or equal to 6 standard cubic feet per hour. Note that a natural gas

processing plant is defined as any processing site engaged in the extraction of natural gas liquids from field gas, fractionation of mixed natural gas liquids to natural gas products, or both. A Joule-Thompson valve, a dew point suppression valve, or an isolated or stand-alone Joule-Thompson skid is not a natural gas processing plant.

The Ventura County APCD does not require permits for the installation and operation of pneumatic controllers and other components such as valves and flanges. Therefore, this condition authorizes the work necessary to comply with these pneumatic controller requirements provided that the permittee comply with all the requirements of Section 60.5390, including the required notification, recordkeeping and reporting requirements.

5. Storage vessels subject to this NSPS shall comply with Section 60.5395. A storage vessel is defined as a unit that is constructed primarily of nonearthen materials (such as wood, concrete, steel, fiberglass, or plastic) which provides structural support and is designed to contain an accumulation of liquids or other materials. Note that pressure vessels designed to operate in excess of 204.9 kilopascals (29.7 psi) and without emissions to the atmosphere are not considered to be storage vessels. Also, process vessels such as surge control vessels, bottoms receivers, and knockout vessels are not considered to be process vessels.

   In general, the NSPS requires that individual storage vessels with VOC emissions equal to or greater than 6 tons per year achieve at least 95.0 percent reduction in VOC emissions. These requirements do not apply to storage vessels subject to and controlled in accordance with the requirements for storage vessels in 40 CFR Part 60, Subpart Kb, or 40 CFR Part 63, Subparts G, CC, HH, WW, or HHH.

   The Ventura County APCD does require permits for the installation and operation of storage vessels such as crude oil storage tanks, wash tanks, and produced water storage tanks. In addition, these tanks must comply with the vapor recovery requirements of Rule 71.1, "Crude Oil Production and Separation". If a tank that complies with Rule 71.1 has VOC emission of 6 tons per year of more, the permittee shall apply for, and obtain, an APCD Authority to Construct for the equipment necessary to comply with Section 60.5395 of the NSPS.

6. All process units, except compressors, located at an onshore natural gas processing plant subject to this NSPS shall comply with Section 60.5400. A process unit means components assembled for the extraction of natural gas liquids from field gas, the fractionation of the liquids into natural gas products or other operations associated with the processing of natural gas products.

   In general, the NSPS requires a leak detection and repair program for components such as pressure relief devices, pumps and valves that reflects the procedures and leak thresholds established in 40 CFR Part 60, Subpart VVa, the NSPS for Equipment Leaks of VOC in

the Synthetic Organic Chemicals Manufacturing Industry (that is, this NSPS OOOO references out to NSPS VVa). For certain components, a leak is defined as 500 ppm or greater and a first attempt at a repair must be made no later than 5 calendar days after a leak is detected.

The Ventura County APCD does not require permits for the installation and operation of components such as pressure relief devices, pumps, valves and flanges. Therefore, this condition authorizes any work necessary to comply with these leak detection and repair requirements provided that the permittee comply with all the requirements of Section 60.5400, including the required notification, recordkeeping and reporting requirements. Any onshore natural gas processing plant at this facility subject to this NSPS will be specifically addressed elsewhere in this permit, as applicable.

7. Sweetening units at onshore natural gas processing plants subject to this NSPS shall comply with Section 60.5405. A sweetening unit is defined as a process device that removes hydrogen sulfide and / or carbon dioxide from the sour natural gas stream. To qualify as a sweetening unit, there must be sulfur recovery technology with a liquid sulfur accumulation rate. These requirements do not apply to sweetening units located on offshore oil platforms in Ventura County. The requirements also do not apply to devices that remove hydrogen sulfide or carbon dioxide that use replaceable media or units that use membrane separation technology.

   In general, the NSPS requires that the sweetening unit achieve a minimum SO2 reduction efficiency that varies from approximately 74.0% to 99.9% depending on the hydrogen sulfide content of the acid gas and the sulfur feed rate.

   The Ventura County APCD does require an Authority to Construct for the installation of a sweetening unit at both onshore natural gas plants and offshore natural gas plants. Any sweetening unit at this facility subject to this NSPS will be specifically addressed elsewhere in this permit, as applicable.

13. PART 70 PERMIT APPLICATION PACKAGE

The Part 70 permit application, which was submitted by this facility, is included in this section for reference only and is not a part of the Part 70 permit.

During the processing of the permit application, additional information was submitted by the facility in response to District requests. This additional information is included with the application. If the applicant was asked to replace a page or a portion of the application, the original submittal is stamped "REPLACED" and the replacement page or section is placed in front of the original. The applicant and District correspondence for the Part 70 permit application is located in the District permit file for this stationary source.