



DEC 19 2013

Mr. Joey Barulich  
Vintage Production California, LLC  
9600 Ming Ave, Suite 300  
Bakersfield, CA 93311

**Re: Notice of Minor Title V Permit Modification**  
**District Facility # S-8282**  
**Project # S-113447**

Dear Mr. Barulich:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued S-8282-17-1 into the Title V operating permit. This modification consists of transfer of location and equipping the tank with a PV vent for Rule 4623 compliance.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-8282-17-1, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,



David Warner  
Director of Permit Services

Enclosures

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

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

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

# TITLE V APPLICATION REVIEW

Minor Modification  
Project #: S-1133447

Engineer: Kamaljit Sran  
Date: November 12, 2013

Facility Number: S-8282  
Facility Name: Vintage Production California, LLC  
Mailing Address: 9600 Ming Ave, Suite 300  
Bakersfield, CA 93311

Contact Name: Joey Barulich  
Phone: (661) 968-8075

Responsible Official: Denny Brown  
Title: Operations Manager

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## I. PROPOSAL

Vintage Production California, LLC is proposing a Title V minor permit modification to incorporate the recently issued S-8282-17-1 into the Title V operating permit. This modification consists of transfer of location and equipping the tank with a PV vent for Rule 4623 compliance.

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

## II. FACILITY LOCATION

Light Oil Western Source at Elk Hills (Elk Hills Oil & Gas Field)

The equipment will be located at the 14D facility located at the NW/4 of Section 14, Township 32S, Range 24E.

## III. EQUIPMENT DESCRIPTION

*S-8282-17-2: 750 BBL FIXED ROOF CRUDE OIL PRODUCTION TANK WITH PV VENT*

#### **IV. SCOPE OF EPA AND PUBLIC REVIEW**

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

#### **V. APPLICABLE REQUIREMENTS**

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

#### **VI. DESCRIPTION OF PROPOSED MODIFICATIONS**

Vintage (facility S-8282) is a light oil producing facility.

Crude oil production tank batteries receive produced fluids from the enhanced oil recovery operations. These facilities separate the produced water from the crude oil prior to shipment. Produced water is piped to a water plant for use in the steam generators or to a disposal well and the dehydrated oil is pumped into a sales line for delivery to a refining operation.

Produced vapors may be collected and used as fuel for combustion equipment or injected into the formation. Non-condensable vapors with a high H<sub>2</sub>S content must be treated in a sulfur removal system prior to incineration in the steam generators to ensure compliance with permitted emission limits.

Modification consists of equipping the tank with pv valve and transferring the tank to another location.

The permit unit was subject to the District NSR Rule upon application for Authority to Construct (ATC). In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the ATC was not included in the requirements for this permit unit as this requirement has been satisfied with filing of this application.
- Conditions 2, 3, & 4 from the ATC were included as conditions 1, 2, & 3 of the requirements for this permit unit.
- Condition 5 from the ATC was included as condition 41 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.

- Conditions 6 through 14 from the ATC were included as conditions 4 through 12 of the requirements for this permit unit.

## VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

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

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

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

## VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. S-8282-17-2

Vintage Production California, LLC  
Facility # S-8282  
Project # S-1133447

November 12, 2013

- B. Authority to Construct No. S-8282-17-1
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit No.'s S-8282-17-0

# ATTACHMENT A

Proposed Modified Title V Operating Permit No.  
(S-8282-17-2)

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-8282-17-2

SECTION: NW14 TOWNSHIP: 32S RANGE: 24E

**EQUIPMENT DESCRIPTION:**

750 BBL FIXED ROOF CRUDE OIL PRODUCTION TANK WITH PV VENT

EXPIRATION DATE: 08/31/2016

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## PERMIT UNIT REQUIREMENTS

1. True vapor pressure of liquids stored shall be less than 1.5 psia. [District Rule 4623] Federally Enforceable Through Title V Permit
2. Tank throughput shall not exceed 300 bbl/day on a monthly average basis. [District Rule 2201] Federally Enforceable Through Title V Permit
3. VOC emission rate shall not exceed 49.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall be equipped with a pressure-vacuum (PV) relief valve set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in gas-tight condition except when the operating pressure exceeds the valve's set pressure. [District Rule 4623] Federally Enforceable Through Title V Permit
5. This tank shall be in a gas-tight condition. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
6. Permittee shall conduct True Vapor Pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 4623] Federally Enforceable Through Title V Permit
7. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
8. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
9. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

DRAFT

10. Operator shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The record shall include the tank identification number, PTO number, type of stored organic liquid, TVP and API gravity of the stored organic liquid, test methods used, and a copy of the test results. An operator who uses the information in Appendix A of District Rule 4623 (5/19/05) to demonstrate the TVP and/or API gravity of the stored organic liquid shall submit information to the APCO within 45 days after the date that the type of organic liquid stored in the tank has been determined. [District Rule 4623] Federally Enforceable Through Title V Permit
11. Permittee shall maintain monthly records of average daily crude oil throughput and shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] Federally Enforceable Through Title V Permit
12. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit
13. Formerly S-1130-120-0
14. Formerly S-1641-57.
15. Formerly S-382-786.
16. Formerly S-1216-52.

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

DRAFT

# **ATTACHMENT B**

**Authority to Construct No.  
(S-8282-17-1)**



## AUTHORITY TO CONSTRUCT

PERMIT NO: S-8282-17-1

ISSUANCE DATE: 08/14/2013

LEGAL OWNER OR OPERATOR: VINTAGE PRODUCTION CALIFORNIA LLC

MAILING ADDRESS: 9600 MING AVE, SUITE 300  
BAKERSFIELD, CA 93311

LOCATION: LIGHT OIL WESTERN STATIDNARY SOURCE  
KERN COUNTY, CA

SECTION: NE08 TOWNSHIP: 32S RANGE: 24E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 750 BBL FIXED ROOF CRUDE OIL PRODUCTION TANK (SECTION 8 LEASE): TRANSFER LOCATION TO THE 14D FACILITY LOCATED IN THE NW/4 SECTION 14, T32S, R24E. INSTALL P/V VENT IN COMPLIANCE WITH DISTRICT RULE 4623, DEEM UNIT AS NON-DORMANT EMISSIONS UNIT

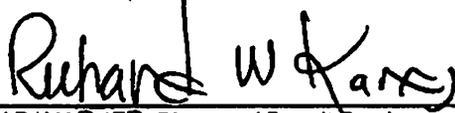
### CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. True vapor pressure of liquids stored shall be less then 1.5 psia. [District Rule 4623] Federally Enforceable Through Title V Permit
3. Tank throughput shall not exceed 300 bbl/day on a monthly average basis. [District Rule 2201] Federally Enforceable Through Title V Permit
4. VOC emission rate shall not exceed 49.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] Federally Enforceable Through Title V Permit
6. This tank shall be equipped with a pressure-vacuum (PV) relief valve set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in gas-tight condition except when the operating pressure exceeds the valve's set pressure. [District Rule 4623] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

  
DAVID WARNER, Director of Permit Services

S-8282-17-1 Aug 14 2013 4:17PM - JDI/ESW JUNE INNOVATION / NOT RECORDED

7. This tank shall be in a gas-tight condition. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
8. Permittee shall conduct True Vapor Pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 4623] Federally Enforceable Through Title V Permit
9. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
10. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
11. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
12. Operator shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The record shall include the tank identification number, PTO number, type of stored organic liquid, TVP and API gravity of the stored organic liquid, test methods used, and a copy of the test results. An operator who uses the information in Appendix A of District Rule 4623 (5/19/05) to demonstrate the TVP and/or API gravity of the stored organic liquid shall submit information to the APCO within 45 days after the date that the type of organic liquid stored in the tank has been determined. [District Rule 4623] Federally Enforceable Through Title V Permit
13. Permittee shall maintain monthly records of average daily crude oil throughput and shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] Federally Enforceable Through Title V Permit
14. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit
15. Formerly S-1130-120-0
16. Formerly S-1641-57.
17. Formerly S-382-786.
18. Formerly S-1216-52.

# ATTACHMENT C

## Emissions Increases

The project does not result in an emissions increase.

# ATTACHMENT D

Application



Vintage Production California LLC

A subsidiary of Occidental Petroleum Corporation



RECEIVED

9600 Ming Avenue, Suite 300  
Bakersfield, California 93311  
Phone 661.869.8000, Fax 661.869.8170

AUG 19 2013

Permits Services  
SJVAPCD

August 15, 2013

Mr. Martin Keast  
San Joaquin Valley Unified APCD  
1990 East Gettysburg Avenue  
Fresno, CA 93726-0244

SUBJECT: ADMINISTRATIVE AMENDMENT TO TITLE V PERMIT S-8282  
IMPLEMENT AUTHORITY TO CONSTRUCT:  
S-8282-17-1

Dear Mr. Keast:

Please find attached the Title V permit administrative amendment application for Project S-1130890.

If you have any questions please call me at (661) 869-8075.

Sincerely,

Joey Barulich  
HES Consultant  
Vintage Production California LLC

# San Joaquin Valley Air Pollution Control District

www.valleyair.org

RECEIVED

AUG 19 2013

## Permit Application For:

Permits Services

ADMINISTRATIVE AMENDMENT     MINOR MODIFICATION     SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <b>Vintage Production California LLC (VPC)</b>	
2. MAILING ADDRESS:	
STREET/P.O. BOX: <b>9600 Ming Avenue, Suite 300</b>	
CITY: <b>Bakersfield</b>	STATE: <b>CA</b>
	9-DIGIT ZIP CODE: <b>93311</b>
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:	
STREET: _____	CITY: <b>LOW</b>
<b>NW</b> ¼ SECTION <b>14</b>	TOWNSHIP <b>32S</b> RANGE <b>24E</b>
INSTALLATION DATE: _____	
4. GENERAL NATURE OF BUSINESS: <b>Crude Oil and Natural Gas Production</b>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)	
<b>Incorporate ATC S-8282-17-1 into Title V permit S-8282 – Vintage Production California LLC, Light Oil Western stationary source.</b>	
6. TYPE OR PRINT NAME OF APPLICANT: <b>Joey Barulich – Vintage Production California LLC</b>	TITLE OF APPLICANT: <b>HES Consultant</b>
7. SIGNATURE OF APPLICANT: 	DATE: <b>08/15/13</b>
	PHONE: <b>(661) 869-8075</b>
	FAX: <b>(661) 869-8170</b>
	EMAIL: <b>joey_barulich@oxy.com</b>

**For APCD Use Only:**

DATE STAMP	FILING FEE RECEIVED: \$ _____	CHECK#: _____
	DATE PAID: _____	
	PROJECT NO: <b>5-1133447</b>	FACILITY ID: <b>S8282</b>

*TV009*

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

**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM**

**I. TYPE OF PERMIT ACTION (Check appropriate box)**

SIGNIFICANT PERMIT MODIFICATION  
 MINOR PERMIT MODIFICATION

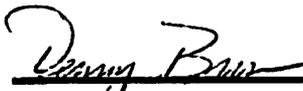
ADMINISTRATIVE  
AMENDMENT

COMPANY NAME: <b>Vintage Production California LLC</b>	FACILITY ID: - <b>S - 8282</b>
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: <b>Vintage Production California LLC</b>	
3. Agent to the Owner: <b>Joey Barulich</b>	

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

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

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

  
Signature of Responsible Official

11-12-13  
Date

**Denny Brown**  
Name of Responsible Official (please print)

**Operations Manager**  
Title of Responsible Official (please print)

# ATTACHMENT E

Previous Title V Operating Permit No.  
S-8282-17-0

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-8282-17-0

**EXPIRATION DATE:** 08/31/2016

**SECTION:** NE08 **TOWNSHIP:** 32S **RANGE:** 24E

**EQUIPMENT DESCRIPTION:**

750 BBL FIXED ROOF CRUDE OIL PRODUCTION TANK (SECTION 8 LEASE)

## PERMIT UNIT REQUIREMENTS

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1. True vapor pressure of liquids stored shall not exceed 1.5 psia. [District Rule 4623] Federally Enforceable Through Title V Permit
2. This equipment shall not be operated for any reason until an Authority to Construct permit is issued approving all necessary retrofits required to comply with the applicable requirements of District Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
3. No modification to this unit shall be performed without an Authority to Construct for such modification(s), except for changes specified in conditions below. [District Rule 2010] Federally Enforceable Through Title V Permit
4. All liquids shall be removed and the produced crude oil inlet line shall be physically disconnected. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Formerly S-1130-120-0
6. Formerly S-1641-57.
7. Formerly S-382-786.
8. Formerly S-1216-52.

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