



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



AUG 20 2013

Mr. Phil Acosta
Vintage Production California LLC
9600 Ming Ave, Suite 300
Bakersfield, CA 93311

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)
District Facility # S-1737
Project # 1132867**

Dear Mr. Acosta:

Enclosed for your review is the District's analysis of an application for Authorities to Construct for the facility identified above. You requested that Certificates of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The project authorizes two 500 bbl crude oil storage tanks connected to existing vapor control system S-1737-168.

After addressing all comments made during the 45-day EPA comment period, the District intends to issue the Authorities to Construct with Certificates of Conformity. Prior to operating with modifications authorized by the Authorities to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,



David Warner
Director of Permit Services

Enclosures

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 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

CH&SC 41700 Health Risk Assessment
CH&SC 42301.6 School Notice
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. Project Location

The existing and new tanks are located in VPCs light oil central stationary source.

Permit #	Location	Qtr	Section	Township	Range
S-1737-168, '-185, '-186	Rose Facility	SE	36	26S	24E

The site is approximately one mile north of the city of Wasco adjacent to Highway 43, in Kern County. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

A project map is included in **Attachment II**.

IV. Process Description

Crude oil from nearby producing wells is routed through this vapor-controlled tank battery, including the existing 3,000 Bbl capacity petroleum storage tank, to separate crude oil, water and produced gas into separate streams for further processing.

Proposed Modifications

Two existing 500 bbl water storage tanks (exempt) will be converted to crude oil storage tanks (ATCs S-1737-185-0 and '-186-0) and connected to the S-1737-168 vapor control system.

A facility plot plan is provided in **Attachment II**.

V. Equipment Listing

Pre-Project Equipment Description:

ATC S-1737-168-4: MODIFICATION OF 3000 BBL FIXED ROOF CRUDE OIL GAUGE STORAGE TANK, 3-PHASE SEPARATOR, TWO HEATER TREATERS (EACH WITH BURNER(S) RATED AT 5 MMBTU/HR OR LESS), TWO 2-PHASE SEPARATORS SERVED BY VAPOR RECOVERY SYSTEM SHARED WITH TANKS S-1737-169, '-170, '-171 AND OPTIONAL PORTABLE TANKS S-1737-181, '-182, '-183 AND/OR '-184. VAPOR RECOVERY SYSTEM CONSISTS OF COMPRESSOR AND ASSOCIATED PIPING DISCHARGING TO FLARE S-1737-180-0 AND/OR SALES GAS LINE: ALLOW VAPOR CONTROL SYSTEM TO VENT TO FLARE S-1737-167

Proposed Modification:

ATC S-1703-168-6: MODIFICATION OF 126,000 GALLON FIXED ROOF CRUDE OIL GAUGE STORAGE TANK, 3-PHASE SEPARATOR, TWO HEATER TREATERS (EACH WITH BURNER(S) RATED AT 5 MMBTU/HR OR LESS), TWO 2-PHASE SEPARATORS SERVED BY VAPOR RECOVERY SYSTEM SHARED WITH TANKS S-1737-169, '-170, AND '-171. VAPOR RECOVERY SYSTEM CONSISTS OF COMPRESSOR AND ASSOCIATED PIPING DISCHARGING TO FLARES S-1737-167 AND/OR '-180 AND/OR SALES GAS LINE: CONNECT TANKS S-1737-185-0 AND '-186-0 TO THE VAPOR CONTROL SYSTEM

Post Project Equipment Description:

PTO S-1737-168-4: 3,000 BBL FIXED ROOF CRUDE OIL GAUGE TANK, 3-PHASE SEPARATOR, TWO HEATER TREATERS (EACH WITH BURNER(S) RATED AT 5 MM BTU/HR OR LESS), TWO-TWO PHASE SEPARATORS SERVED BY VAPOR RECOVERY SYSTEM SHARED WITH TANKS S-1373-169, S-1737-169, '-170, '171, '-185, '-186 AND OPTIONAL PORTABLE TANKS S-1737-181, '-182, '-183, AND/OR '-184. VAPOR RECOVERY SYSTEM CONSISTS OF COMPRESSOR AND ASSOCIATED PIPING DISCHARGING TO FLARES S-1737-167 AND/OR '-180 AN/OR SALES GAS LINE

PTO S-1737-185-0: 500 BBL FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON S-1737-168

PTO S-1737-186-0: 500 BBL FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON S-1737-168

VI. Emission Control Technology Evaluation

The authorized crude oil storage tanks will be served by a vapor control system listed on S-1737-168. As both the new tanks and vapor control system are subject to a stringent I&M program with no leaks allowed, the expected vapor control efficiency is 99%.

VII. General Calculations

A. Assumptions

- Facility operates 24 hr/day, 365 days/yr.
- According to District FYI -111 Category 11, connection of tanks S-1737-185 and '-186 to the existing '-168 vapor control system is not a NSR modification (of '-168). Therefore the change to '-168 is not subject to Rule 2201 (NSR analysis) and calculations are not required. PE2 for S-1737-168 will be calculated (restated) for inclusion on the PAS emissions profiles.
- There is no increase in fugitive emissions from '-168 with connection of '-185 and '-186 S-1737-168 fugitive emissions (project 1060118, S-3770-1)

	lb/day	lb/yr
Tank components	0.14	
Vapor recovery/compressor piping	0.3	
Heater treater	0.48	
Tie-in to 2 nd heater treater	0.2	
total	1.1	402

S-1737-185 and '-186

- Only fugitive VOCs emitted from components in gas/light liquid/light crude oil service are calculated.
- Fugitives components associated with the tanks are from the tank up to the vapor control system truck line.

Fugitive Emissions Component Counts (Gas Light Liquid Service)

	Valves	Pump Seals	Others	Connectors	Flanges	Open Ended Lines
S-1737-185 and '-186 (each)	5	0	25	15	25	0

B. Emission Factors

Fugitive component emissions are calculated using the “revised screening” emissions factors of CARB/CAPCOA “California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities” (please see **Attachment III**).

C. Calculations

1. Pre-Project Potential to Emit (PE1)

Since this is a new emissions unit, PE1 = 0 for all pollutants.

2. Post Project Potential to Emit (PE2)

The potential to emit for this unit is summarized in the following table:

Post Project Potential to Emit (PE2)		
Permit Unit	Daily VOC Emissions (lb/day)	Annual VOC Emissions (lb/year)
'-168	1.1	402
'-185	0.3	91
'-186	0.3	91

Emissions profiles are included in **Attachment IV**.

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to Section 4.9 of District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site. No ERCs have been banked from this source.

The SSPE1 was calculated as the sum of emissions calculated using the District calculator (**Attachment V**) and emissions increases from ATCs S-1737-179-0 and '-181-0 through '-184-0. Additional outstanding ATCs had no emissions increases. No ERCs have been banked from this source.

Pre-Project Stationary Source Potential to Emit [SSPE1] (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
District Calculator	64,729	1,100	12,912	198,140	58,763
ATC S-1737-179-0	212	42	608	2,569	368
ATCs S-1737-181-0 through '-184-0	0	0	0	0	73 x 4 = 292
Pre-Project SSPE (SSPE1)	64,941	1,142	13,520	200,709	59,423

4. Post Project Stationary Source Potential to Emit (SSPE2)

Pursuant to Section 4.10 of District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

Pre Project Stationary Source Potential to Emit [SSPE1] (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
Pre Project SSPE (SSPE1)	64,941	1,142	13,520	200,709	59,423
'-185 and '-186	0	0	0	0	182
Post Project SSPE (SSPE2)	64,941	1,142	13,520	200,709	59,605

5. Major Source Determination

Rule 2201 Major Source Determination:

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following shall not be included:

- any ERCs associated with the stationary source
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165

Rule 2201 Major Source Determination (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
Facility emissions pre-project	64,941	1,142	13,520	200,709	59,423
Facility emissions – post project	64,941	1,142	13,520	200,709	59,605
Major Source Threshold	20,000	140,000	140,000	200,000	20,000
Major Source?	Yes	No	No	Yes	Yes

¹Since the facility is expected to be over the major source threshold regardless of excluding fugitive emissions, these values were not recalculated from the SSPE1 and SSPE2 listed previously (this value contains all fugitive VOC emissions at the source).

As seen in the table above, the facility is an existing Major Source for NO_x, CO, and VOC only and will remain a major source for only these pollutants as a result of this project.

Rule 2410 Major Source Determination:

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). Therefore the following PSD Major Source thresholds are applicable.

PSD Major Source Determination (tons/year)							
	NO ₂	VOC	SO ₂	CO	PM	PM ₁₀	CO _{2e}
Estimated Facility PE before Project Increase	32.5	29.7	0.6	100.3	6.8 ¹	6.8	59,955
PSD Major Source Thresholds	250	250	250	250	250	250	100,000
PSD Major Source ? (Y/N)	N	N	N	N	N	N	N

¹Since PM emissions from this source are primarily the result of gas combustion and generally all PM emissions from gas consumption are less than 10 microns in diameter, it is assumed that all PM is PM₁₀

²117 MMBtu/hr (combined heat input from PTO fee schedules) x 8760 hr/yr
= 1,024,920 MMBtu/yr

CO₂ Emissions = 1,024,920 MMBtu/yr x 116.89 lb/MMBtu
= 119,802,899 lb-CO₂(eq)/yr

CH₄ Emissions = 1,024,920 MMBtu/yr x 0.002 lb/MMBtu x 21 lb-CO₂(eq) per lb-CH₄
= 43,047 lb-CO₂(eq)/yr

N₂O Emissions = 1,024,920 MMBtu/yr x 0.0002 lb/MMBtu x 310 lb-CO₂(eq) per lb-N₂O
= 63,545 lb-CO₂(eq)/yr

Total = 119,909,491 lb-CO₂(eq)/yr / 2000 lb/short ton
= **59,955 tons-CO₂(eq)/year**

As shown in the preceding table, the facility is not an existing major source for PSD for at least one pollutant. Therefore the facility is not an existing major source for PSD.

6. Baseline Emissions (BE)

The BE calculation (in lbs/year) is performed pollutant-by-pollutant for each unit within the project, to calculate the QNEC and if applicable, to determine the amount of offsets required.

Pursuant to Section 3.7 of District Rule 2201, BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to District Rule 2201.

Since the proposed tanks are a new emissions units, BE = PE₁ = 0 for all pollutants.

7. SB 288 Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

Since this source is not included in the 28 specific source categories specified in 40 CFR 51.165, the increase in fugitive emissions are not included in the SB 288 Major Modification calculation. Therefore, this project does not constitute an SB 288 Major Modification.

8. Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

Since this source is not included in the 28 specific source categories specified in 40 CFR 51.165, the increase in fugitive emissions are not included in the SB 288 Major Modification calculation. Therefore, this project does not constitute a Federal Major Modification.

9. Rule 2410 – Prevention of Significant Deterioration (PSD) Applicability Determination

Rule 2410 applies to pollutants for which the District is in attainment or for unclassified, pollutants. The pollutants addressed in the PSD applicability determination are listed as follows:

- Greenhouse gases (GHG): CO₂, N₂O, CH₄, HFCs, PFCs, and SF₆

The first step of this PSD evaluation consists of determining whether the facility is an existing PSD Major Source or not (See Section VII.C.5 of this document).

In the case the facility is an existing PSD Major Source, the second step of the PSD evaluation is to determine if the project results in a PSD significant increase.

In the case the facility is NOT an existing PSD Major Source but is an existing source, the second step of the PSD evaluation is to determine if the project, by itself, would be a PSD major source.

I. Potential to Emit for New or Modified Emission Units vs PSD Major Source Thresholds

As a screening tool, the project potential to emit from all new and modified units is compared to the PSD major source threshold, and if total project potential to emit from all new and modified units is below this threshold, no further analysis will be needed.

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). Therefore the following PSD Major Source thresholds are applicable.

PSD Major Source Determination: Potential to Emit (tons/year)							
	NO2	VOC	SO2	CO	PM	PM10	CO2e
Total PE from New and Modified Units	0	0.3	0	0	0	0	<100,000*
PSD Major Source threshold	250	250	250	250	250	250	100,000
New PSD Major Source?	N	N	N	N	N	N	N

*tank VOC (methane) emissions

As shown in the table above, the project potential to emit, by itself, does not exceed any of the PSD major source thresholds. Therefore Rule 2410 is not applicable and no further discussion is required.

10. Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The QNEC for each pollutant is shown in the table(s) below and reported in the PAS database emissions profile.

The QNEC shall be calculated as follows:

QNEC = (PE2 – BE)/4, where:

QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.
 PE2 = Post Project Potential to Emit for each emissions unit, lb/yr.
 BE = Baseline Emissions (per Rule 2201) for each emissions unit, lb/yr.

QNEC (lb/qtr) — S-1737-185 and '186 (each)					
Pollutant	NO _x	SO _x	PM ₁₀	CO	VOC
PE2 (lb/yr)	0	0	0	0	91
BE (lb/yr)	0	0	0	0	0
QNEC	0	0	0	0	23

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless specifically exempted by Rule 2201, BACT shall be required for the following actions*:

- a. Any new emissions unit with a potential to emit exceeding two pounds per day,
- b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
- c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
- d. Any new or modified emissions unit, in a stationary source project, which results in an SB 288 Major Modification or a Federal Major Modification, as defined by the rule.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

a. New emissions units – PE > 2 lb/day

As seen in Section VII.C.2 of this evaluation, the applicant is proposing to authorize two tanks each with a PE less than 2 lb/day for VOCs. Therefore BACT for new units with PE > 2 lb/day purposes is not triggered.

b. Relocation of emissions units – PE > 2 lb/day

As discussed in Section I above, there are no emissions units being relocated from one stationary source to another; therefore BACT is not triggered.

c. Modification of emissions units – AIPE > 2 lb/day

As discussed in Section I above, there are no units being modified associated with this project. Therefore BACT is not triggered.

d. SB 288/Federal Major Modification

As discussed in Section VII.C.7 above, this project does not constitute an SB 288 and/or Federal Major Modification for any pollutant. Therefore BACT is not triggered for any pollutant.

B. Offsets

1. Offset Applicability

Pursuant to Section 4.5.3, offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the Post Project Stationary Source Potential to Emit (SSPE2) equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The following table compares the post-project facility-wide annual emissions in order to determine if offsets will be required for this project.

Offset Determination (lb/year)					
	NO_x	SO_x	PM₁₀	CO	VOC
Post Project SSPE (SSPE2)	64,941	1,142	13,520	200,709	59,605
Offset Threshold	20,000	54,750	29,200	200,000	20,000
Offset calculations required?	Yes	No	No	Yes	Yes

2. Quantity of Offsets Required

As seen above, the SSPE2 is greater than the offset thresholds for NO_x, CO, and VOC; therefore offset calculations will be required. However PE2 emissions of NO_x and CO are zero and the increase in VOC emissions from each tank is less than 0.5 lb/day which rounds to zero for offsets calculations pursuant to District policy APR 1130. Therefore, offsets are not required.

C. Public Notification

1. Applicability

Public noticing is required for:

- a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
- b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- c. Any project which results in the offset thresholds being surpassed, and/or
- d. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant.

a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

As demonstrated in VII.C.7, this project does not constitute an SB 288 or Federal Major Modification; therefore, public noticing for SB 288 or Federal Major Modification purposes is not required.

b. PE > 100 lb/day

The PE2 for each authorized tank is compared to the daily PE Public Notice thresholds in the following table:

PE > 100 lb/day Public Notice Thresholds			
Pollutant	PE2 (lb/day)	Public Notice Threshold	Public Notice Triggered?
NO _x	0.0	100 lb/day	No
SO _x	0.0	100 lb/day	No
PM ₁₀	0.0	100 lb/day	No
CO	0.0	100 lb/day	No
VOC	0.3	100 lb/day	No

Therefore, public noticing for PE > 100 lb/day purposes is not required.

c. Offset Threshold

The SSPE1 and SSPE2 are compared to the offset thresholds in the following table.

Offset Thresholds				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO _x	69,941	69,941	20,000 lb/year	No
SO _x	1,142	1,142	54,750 lb/year	No
PM ₁₀	13,520	13,520	29,200 lb/year	No
CO	200,709	200,709	200,000 lb/year	No
VOC	59,423	59,605	20,000 lb/year	No

As detailed above, there were no thresholds surpassed with this project; therefore public noticing is not required for offset purposes.

d. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE = SSPE2 – SSPE1. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table.

SSIPE Public Notice Thresholds					
Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
NO _x	69,941	69,941	0	20,000 lb/year	No
SO _x	1,142	1,142	0	20,000 lb/year	No
PM ₁₀	13,520	13,520	0	20,000 lb/year	No
CO	200,709	200,709	0	20,000 lb/year	No
VOC	59,605	59,423	182	20,000 lb/year	No

As demonstrated in the preceding table, the SSIPEs for all pollutants were less than 20,000 lb/year; therefore public noticing for SSIPE purposes is not required.

2. Public Notice Action

As discussed above, public noticing is not required for this project.

D. Daily Emission Limits (DELs)

DELs and other enforceable conditions are required by Rule 2201 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. The DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

Proposed Rule 2201 (DEL) Conditions:

VOC fugitive emissions from the components in gas/light oil service on tank and from tank to vapor control, system trunk line shall not exceed 0.3 lb/day. [District Rule 2201] Y

E. Compliance Assurance

1. Source Testing

Applicant will be required to test the VOC content of vapor recovery gas using the following test method.

VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]

2. Monitoring

The following monitoring conditions are required to demonstrate compliance with Rule 2201.

All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Y

3. Recordkeeping

Recordkeeping is required to demonstrate compliance with the offset, public notification and daily emission limit requirements of Rule 2201. The following condition(s) are listed on the permit to operate:

The permittee shall keep accurate records of the dates of inspection and monitoring and the components inspected and monitored. [District Rule 2201] Y

Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rules 2201 and 4623] Y

The permittee shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2201 and 4623] Permittee shall maintain accurate

component count for tank according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Y

The permittee shall keep accurate records of the dates of inspection and monitoring and the components inspected and monitored. [District Rule 2201] Y

Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rules 2201 and 4623] Y

The permittee shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2201 and 4623] Y

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

Rule 2520 Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. The proposed modification is a Minor Modification to the Title V Permit.

In accordance with Rule 2520, these modifications:

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

As discussed above, the facility has applied for a Certificate of Conformity (COC). Therefore, the facility must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility may construct/operate under the ATC upon submittal of the Title V administrative amendment application.

The Title V Compliance Certification form is included in **Attachment VI**.

Rule 4001 New Source Performance Standards

This rule incorporates the New Source Performance Standards from 40 CFR Part 60. 40 CFR Part 60, Subparts, K, Ka, Kb, and OOOO and could potentially apply to the storage tanks located at this facility.

40 CFR Part 60, Subparts, K, Ka, and Kb could potentially apply to the storage tanks located at this facility. However, pursuant to 40 CFR 60.110 (b), 60.110(a) (b), and 60.110(b) (b), these subparts do not apply to storage vessels less than 10,000 bbl, used for petroleum or condensate, that is stored, processed, and/or treated at a drilling and production facility prior to custody transfer.

40 CFR Part 60, Subpart OOOO—Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution (constructed, reconstructed, or modified after 8/23/11) applies to single storage vessel, located in the oil and natural gas production segment, natural gas processing segment or natural gas transmission and storage segment. The subject tanks are subject to this subpart. However, Subpart OOOO has no standards for tanks with annual VOC emissions less than 6 tons per year. Therefore, the subject tanks are not an affected facility and subpart OOOO does not apply.

Rule 4101 Visible Emissions

Rule 4101 states that no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity). As emissions from this equipment are made up of fugitive VOC emissions only, visible emissions are not expected to exceed Ringelmann 1 or 20% opacity.

Rule 4102 Nuisance

Rule 4102 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – *Risk Management Policy for Permitting New and Modified Sources* specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

An HRA is not required for a project with a total facility prioritization score of less than one. According to the Technical Services Memo for this project (**Attachment VII**), the total facility prioritization score including this project was greater than one. Therefore, an HRA was

required to determine the short-term acute and long-term chronic exposure from this project.

The cancer risk for this project is shown below:

HRA Summary		
Unit	Cancer Risk	T-BACT Required
S-1737-185 and '-186	0.0	No

The project is approvable without TBACT.

Rule 4623 Storage of Organic Liquids

The existing and proposed tanks are equipped with a vapor control system with a VOC control efficiency of 95%. No throughput/TVP records are required to be kept for fixed-roof tanks equipped with vapor control. Applicant has elected to participate in the voluntary tank preventive inspection, maintenance, and tank cleaning program. Tank cleaning will be conducted according to the requirements of Table 6.

Compliance with the requirements of this rule is expected.

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

California Environmental Quality Act (CEQA)

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The District adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that all project specific emission unit(s) are exempt from Best Available Control Technology (BACT) requirements. Furthermore, the District has

determined that potential emission increases would have a less than significant health impact on sensitive receptors.

Issuance of permits for emissions units not subject to BACT requirements and with health impact less than significant is a matter of ensuring conformity with applicable District rules and regulations and does not require discretionary judgment or deliberation. Thus, the District concludes that this permitting action constitutes a ministerial approval. Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Issue ATCs S-1737-168-6, '-185-0, and '-186-0 subject to the permit conditions on the attached draft ATC in **Attachment VIII**.

X. Billing Information

Annual Permit Fees			
ATC Number	Fee Schedule	Fee Description	Annual Fee
S-1737-168-6	3020-05-E	126,000 gallon tank	\$246.00
S-1737-185-0	3020-05-C	21,000 gallon tank	\$135.00
S-1737-186-0	3020-05-C	21,000 gallon tank	\$135.00

Attachments

- I: ATC S-1737-168-4 and current PTO S-1737-168-2
- II: Project Map and Plot Plan
- III: Fugitive Emissions Calculations
- IV: Emissions Profile
- V: SSPE Calculation
- VI: Title V Compliance Certification Form
- VII: HRA
- VIII: Draft ATCs

Attachment I
ATC S-1737-168-4 and current PTO S-1737-168-2

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1737-168-2

EXPIRATION DATE: 02/28/2014

SECTION: SE36 **TOWNSHIP:** 26S **RANGE:** 24E

EQUIPMENT DESCRIPTION:

126,000 GALLON FIXED ROOF CRUDE OIL GAUGE STORAGE TANK, 3-PHASE SEPARATOR, TWO HEATER TREATERS (EACH WITH BURNER(S) RATED AT 5 MMBTU/HR OR LESS), TWO 2-PHASE SEPARATORS SERVED BY VAPOR RECOVERY SYSTEM SHARED WITH TANKS S-1737-169, '-170, AND '-171. VAPOR RECOVERY SYSTEM CONSISTS OF COMPRESSOR AND ASSOCIATED PIPING DISCHARGING TO 1.8 MMSCFD AIR-ASSISTED FLARE OR GAS SALES PIPELINE

PERMIT UNIT REQUIREMENTS

1. The tank shall be equipped with a fully enclosed fixed roof and shall be maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit
2. Gases from the tanks, heater treaters, and all separators shall be flared or routed to a sales pipeline. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The API gravity of any organic liquid stored or processed in this tank shall be less than 30ø. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
4. The storage tank shall be fully enclosed and shall be maintained in a leak-free condition. The storage tank shall be connected to an APCO-approved vapor recovery system consisting of a closed system that collects all VOCs from the storage tank(s) and a VOC control device. The vapor recovery system shall be maintained in leak-free condition. Collected vapor shall be directed to a gas pipeline distribution system or to an approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in Section 6.4.6 of District Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. Fugitive VOC emissions from all components associated with the vapor recovery system (shared with S-1737-169, '-170, and '-171) including vapor collection piping, vapor compressor, heater treaters, flare gas line, separator vessels and scrubbers shall not exceed 0.98 lb/day as calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c, Oil and Gas Production Screening Value Ranges Emission Factors (Feb 1999). [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

9. Fugitive VOC emissions from all components associated with this tank shall not exceed 0.14 lb/day as calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c, Oil and Gas Production Screening Value Ranges Emission Factors (Feb 1999). [District Rule 2201] Federally Enforceable Through Title V Permit
10. Permittee shall maintain accurate fugitive component count and resultant emissions calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c, Oil and Gas Production Screening Value Ranges Emission Factors (Feb 1999). These records shall be retained on-site for a period of at least five years, and shall be made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Heater treaters shall only be fired on PUC-quality natural gas or LPG. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The permittee shall tune the unit (two heaters) at least twice per calendar year, (from four to eight months apart) using a qualified technician in accordance with the procedure described in Rule 4304. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for a calendar year. No tune-up is required if the unit is not operated during that calendar year; and this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is complete the unit shall be shutdown. [District Rule 4307] Federally Enforceable Through Title V Permit
13. The permittee shall keep accurate records of each organic liquid stored in the tank, including its type and API gravity. [District Rules 1070, 2201 and 4409] Federally Enforceable Through Title V Permit
14. On and after July 1, 2015, the heater treaters in this unit shall comply with the applicable emission requirements of Section 5.1, Table 1 in District Rule 4307. [District Rule 4307] Federally Enforceable Through Title V Permit
15. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 4623] Federally Enforceable Through Title V Permit

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

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1737-168-4

ISSUANCE DATE: 09/12/2012

LEGAL OWNER OR OPERATOR: VINTAGE PRODUCTION CALIFORNIA LLC
MAILING ADDRESS: 9600 MING AVE, SUITE 300
BAKERSFIELD, CA 93311

LOCATION: LIGHT OIL CENTRAL
KERN COUNTY, CA

SECTION: SE36 **TOWNSHIP:** 26S **RANGE:** 24E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 3000 BBL FIXED ROOF CRUDE OIL GAUGE STORAGE TANK, 3-PHASE SEPARATOR, TWO HEATER TREATERS (EACH WITH BURNER(S) RATED AT 5 MMBTU/HR OR LESS), TWO 2-PHASE SEPARATORS SERVED BY VAPOR RECOVERY SYSTEM SHARED WITH TANKS S-1737-169, '-170, '-171 AND OPTIONAL PORTABLE TANKS S-1737-181, '-182, '-183 AND/OR '-184. VAPOR RECOVERY SYSTEM CONSISTS OF COMPRESSOR AND ASSOCIATED PIPING DISCHARGING TO FLARE S-1737-180-0 AND/OR SALES GAS LINE: ALLOW VAPOR CONTROL SYSTEM TO VENT TO FLARE S-1737-167

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. Gases from the tanks, heater treaters, and all separators shall be flared or routed to a sales pipeline. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The API gravity of any organic liquid stored or processed in this tank shall be less than 30ø. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
4. Heater treaters shall only be fired on PUC-quality natural gas or LPG. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

S-1737-168-4 : Aug 8 2013 3:01PM -- EDGEHILR : Joint Inspection NOT Required

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

5. The permittee shall tune the unit (two heaters) at least twice per calendar year, (from four to eight months apart) using a qualified technician in accordance with the procedure described in Rule 4304. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for a calendar year. No tune-up is required if the unit is not operated during that calendar year; and this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is complete the unit shall be shutdown. [District Rule 4307] Federally Enforceable Through Title V Permit
6. On and after July 1, 2015, the heater treaters in this unit shall comply with the applicable emission requirements of Section 5.1, Table 1 in District Rule 4307. [District Rule 4307] Federally Enforceable Through Title V Permit
7. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 99% by weight as determined by the test method specified in Section 6.4.7. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. A leak-free 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 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
11. VOC fugitive emissions from the components in gas service on tank and tank vapor collection system shall not exceed 1.12 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Permittee shall maintain accurate component count for tank according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
14. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
15. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
16. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
17. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

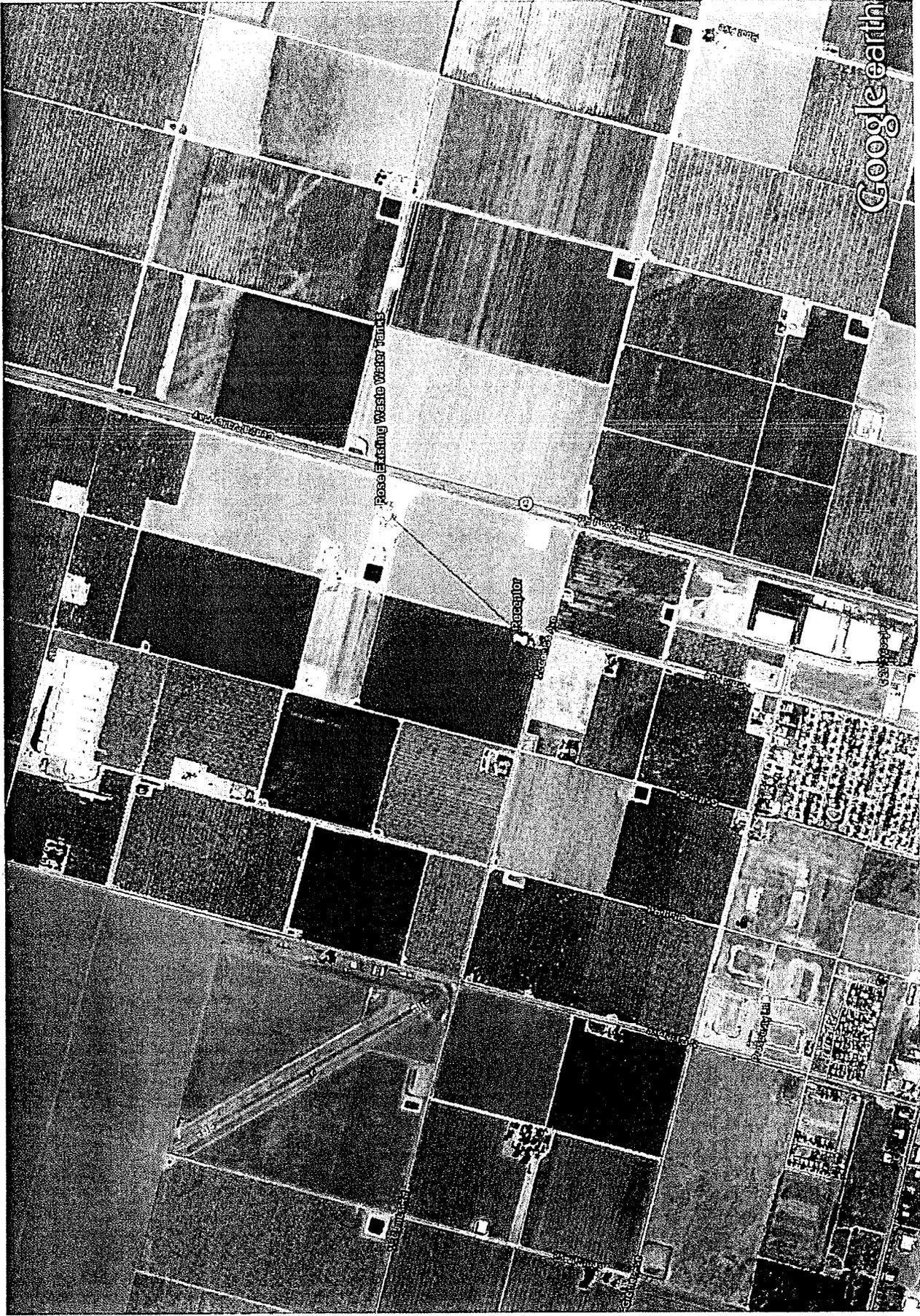
CONDITIONS CONTINUE ON NEXT PAGE

18. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
19. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
20. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
21. If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rules 2201 and 4623]
22. Permittee shall notify the APCO in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rules 4623 and 2080] Federally Enforceable Through Title V Permit
23. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rules 4623 and 2080] Federally Enforceable Through Title V Permit
24. This tank shall be degassed before commencing interior cleaning by 1) exhausting VOCs contained in the tank vapor space to an APCO-approved vapor recovery system until the organic vapor concentration is 5,000 ppmv or less, or is 10 percent or less of the lower explosion limit (LEL), whichever is less 2) by filling the tank with a suitable liquid until 90 percent or more of the maximum operating level of the tank is filled. Suitable liquids are organic liquids having a TVP of less than 0.5 psia, water, clean produced water, or produced water derived from crude oil having a TVP less than 0.5 psia. or 3) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable gas. Degassing shall continue until the operator has achieved a vapor displacement equivalent to at least 2.3 times the tank capacity. Suitable gases are air, nitrogen, carbon dioxide, or natural gas containing less than 10 percent VOC by weight. [District Rule 4623] Federally Enforceable Through Title V Permit
25. During tank degassing, the operator shall discharge or displace organic vapors contained in the tank vapor space to an APCO-approved vapor recovery system. [District Rule 4623] Federally Enforceable Through Title V Permit
26. To facilitate connection to an external APCO-approved recovery system, a suitable tank fitting, such as a manway, may be temporarily removed for a period of time not to exceed 1 hour. [District Rules 4623] Federally Enforceable Through Title V Permit
27. This tank shall be in compliance with the applicable requirements of District Rule 4623 at all times during draining, degassing, and refilling the tank with an organic liquid having a TVP of 0.5 psia or greater. [District Rule 4623] Federally Enforceable Through Title V Permit
28. While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 degrees F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 4623] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

29. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 4623] Federally Enforceable Through Title V Permit
30. The permittee shall keep accurate records of the dates of inspection and monitoring and the components inspected and monitored. [District Rule 2201] Federally Enforceable Through Title V Permit
31. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
32. The permittee shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
33. The permittee shall keep accurate records of each organic liquid stored in the tank, including its type and API gravity. [District Rules 1070, 2201 and 4409] Federally Enforceable Through Title V Permit
34. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 4623] Federally Enforceable Through Title V Permit
35. Authority to Construct S-1737-168-3 shall be implemented prior to or concurrent with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit

Attachment II
Project Map and Plot Plan



Google Earth Pro

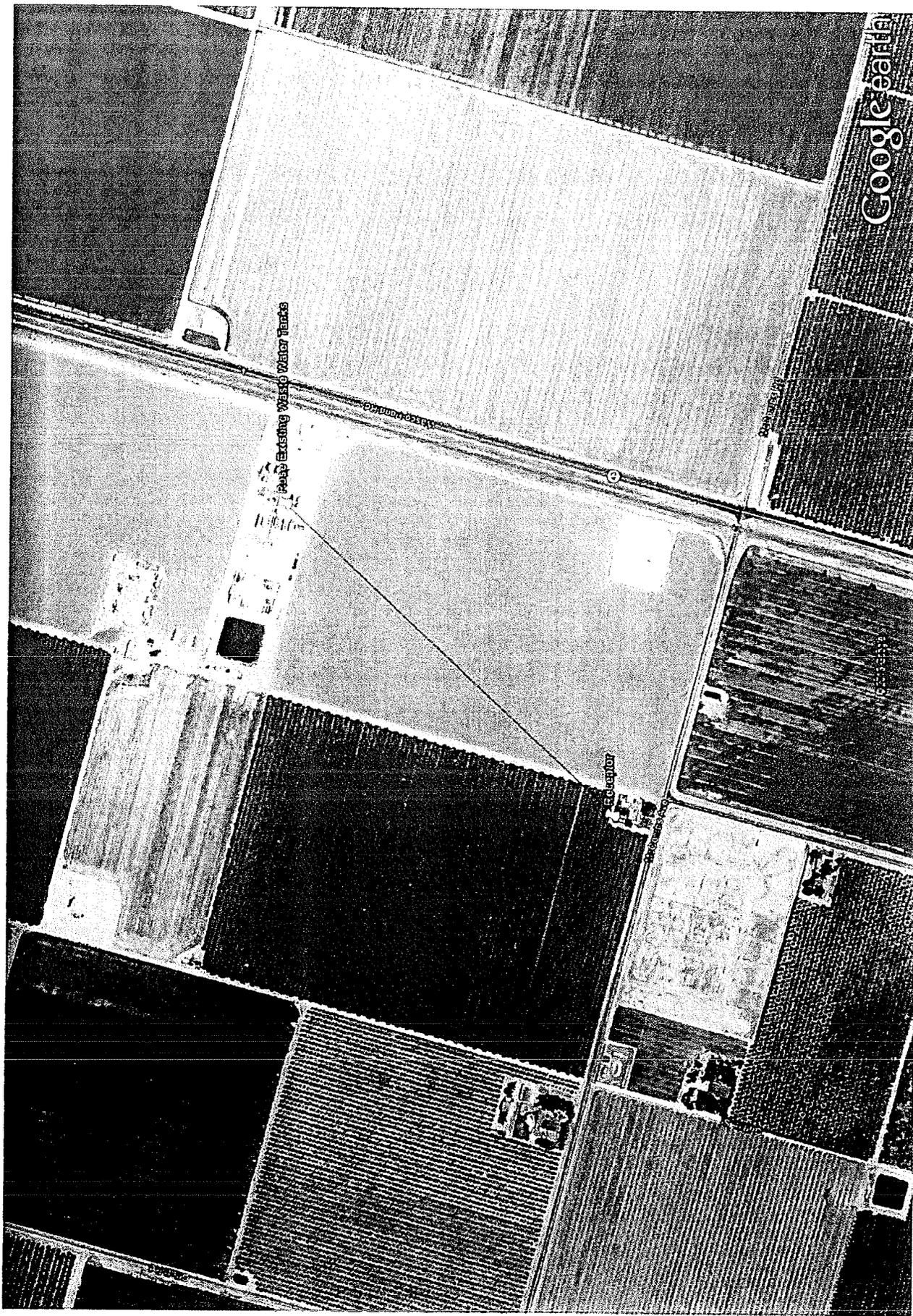
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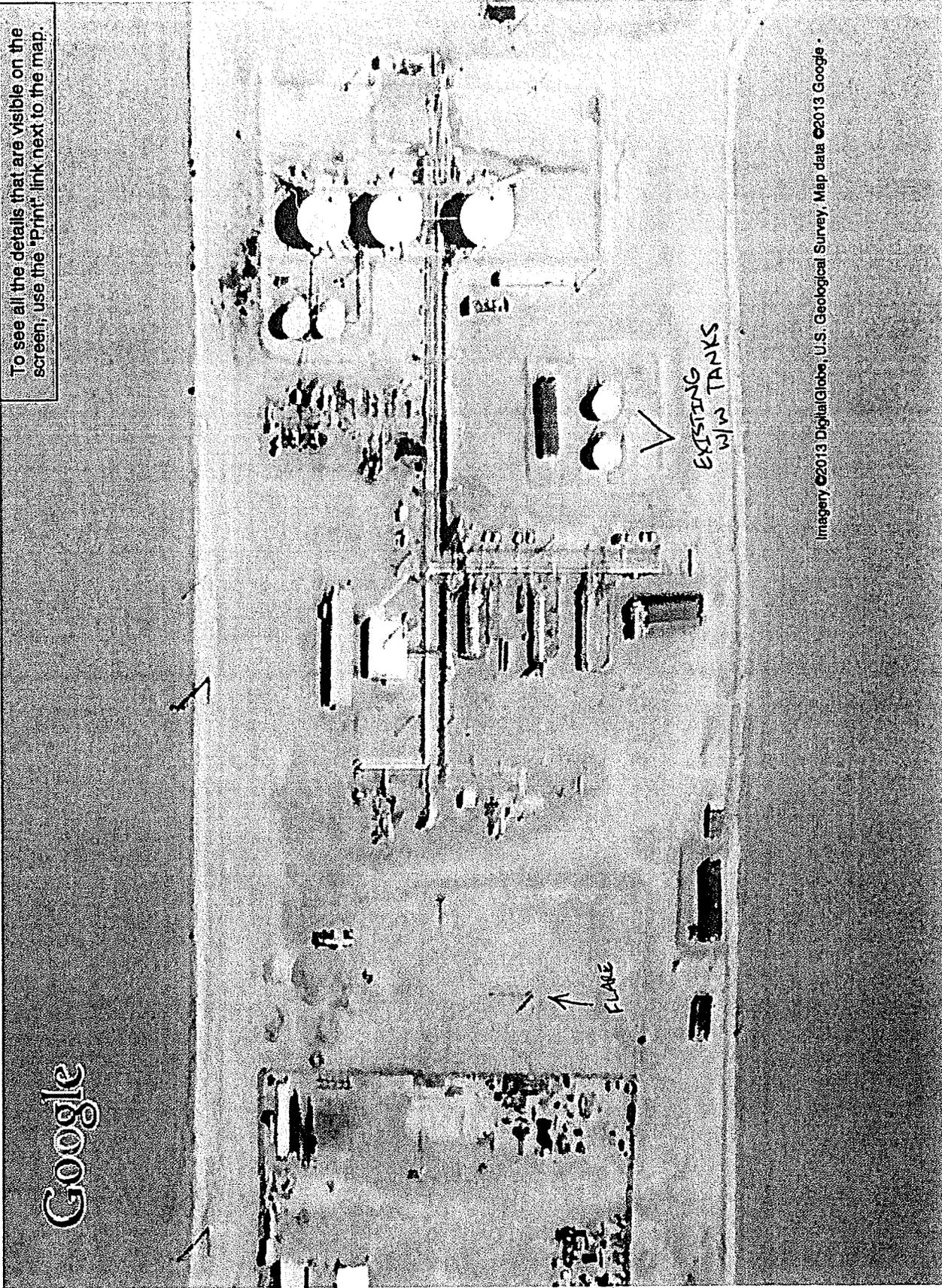
Google Earth

Google Earth Pro

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To see all the details that are visible on the screen, use the "Print" link next to the map.

Google

FLAGE

EXISTING
W/M TANKS

Imagery ©2013 DigitalGlobe, U.S. Geological Survey, Map data ©2013 Google

Attachment III Fugitive Emissions Calculations

Vintage Production Company
Component Increase from Each Proposed Tank

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions
of Fugitive Hydrocarbon Leaks at Petroleum Facilities

Table IV-2c. Oil and Gas Production
Screening Value Ranges Emission Factors

Percentage of components with $\geq 10,000$ ppmv leaks allowed? 0 %
Weight percentage of VOC in the total organic compounds in gas? 100 %
Weight percentage of VOC in the total organic compounds in oil? 100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC		TOC emissions (lb/day)
				< 10,000 ppmv (lb/day/source)	$\geq 10,000$ ppmv (lb/day/source)	
Valves	Gas/Light Liquid	5	0	1.852E-03	7.333E+00	0.01
	Light Crude Oil	0	0	1.005E-03	3.741E+00	0.00
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	25	0	7.778E-03	7.281E+00	0.19
	Light Crude Oil	0	0	6.931E-03	3.757E-01	0.00
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	15	0	6.349E-04	1.370E+00	0.01
	Light Crude Oil	0	0	5.291E-04	1.238E+00	0.00
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	25	0	1.482E-03	3.228E+00	0.04
	Light Crude Oil	0	0	1.270E-03	1.376E+01	0.00
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total Organic Compound (TOC) Emissions = 0.25 lb/day
91 lb/yr

Methane Wt % of TOC from Gas Analyses = 82.77 %
CO2 wt % relative to TOC from Gas Analyses = 3.17 %
CO2 Equivalency factor for Methane = 23
Metric Ton = 2204.6 lb

Methane CO2 (eqv) = TOC lb/day x 365 day/yr x % by wt Methane x (CO2 eqv factor) / (lbs/metric ton)

CO2 = TOC lb/day x 365 day/yr x % by wt CO@ / lbs/metric ton

Methane CO2 (eqv) = 0.789 ton/yr
CO2 = 0.001 ton/yr
Total CO2 (eqv) from proposed modification = 0.790 ton/yr

Attachment IV Emissions Profile

Permit #: S-1737-168-6	Last Updated
Facility: VINTAGE PRODUCTION CALIFORNIA	08/08/2013 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	402.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	1.1
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-1737-185-0	Last Updated
Facility: VINTAGE PRODUCTION CALIFORNIA	08/08/2013 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	91.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.3
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	22.0
Q2:	0.0	0.0	0.0	0.0	23.0
Q3:	0.0	0.0	0.0	0.0	23.0
Q4:	0.0	0.0	0.0	0.0	23.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-1737-186-0	Last Updated
Facility: VINTAGE PRODUCTION CALIFORNIA	08/08/2013 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	91.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.3
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	22.0
Q2:	0.0	0.0	0.0	0.0	23.0
Q3:	0.0	0.0	0.0	0.0	23.0
Q4:	0.0	0.0	0.0	0.0	23.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Attachment V SSPE Calculation

Detailed SSPE Report

Region	Facility	Unit	Mod	NOx	SOx	PM10	CO	VOC	Number of Outstanding ATCs
S	1737	0	3						0
S	1737	110	4						0
S	1737	111	4						0
S	1737	112	5						0
S	1737	113	5						0
S	1737	114	5						0
S	1737	115	5						0
S	1737	116	4						0
S	1737	117	4						0
S	1737	118	4						0
S	1737	119	4						0
S	1737	120	4						0
S	1737	121	4						0
S	1737	137	1	0	0	0	0	726	0
S	1737	138	1	0	0	0	0	730	0
S	1737	139	1	0	0	0	0	730	0
S	1737	140	1	0	0	0	0	730	0
S	1737	141	1	0	0	0	0	730	0
S	1737	142	1	0	0	0	0	726	0
S	1737	143	1	0	0	0	0	730	0
S	1737	144	1	0	0	0	0	730	0
S	1737	145	1	0	0	0	0	723	0
S	1737	146	1	1241	0	365	6752	1606	0
S	1737	147	1	0	0	0	0	730	0
S	1737	148	1	0	0	0	0	730	0
S	1737	149	1	0	0	0	0	730	0

Thursday, August 08, 2013

Page 1 of 2

Notes:

Blank values for a particular permit unit do not necessarily reflect zero emissions. For units with blank values, the PE must still be determined based on physical PE or as limited by permit condition.

For permits that show outstanding ATCs, consult PAS ATC Emission Profile records to determine what the highest PE is for each pollutant.

ATCs for new units (e.g. S-XXXX-X-0) must be added in separately.

ERC's for onsite reductions must be added in separately per Rule 2201 as well.

<i>Region</i>	<i>Facility</i>	<i>Unit</i>	<i>Mod</i>	<i>NOx</i>	<i>SOx</i>	<i>PM10</i>	<i>CO</i>	<i>VOC</i>	<i>Number of Outstanding ATCs</i>
S	1737	154	1	0	0	0	0	0	0
S	1737	155	1	0	0	0	0	0	0
S	1737	156	1	0	0	0	0	0	0
S	1737	157	4	29784	377	8760	16644	14637	2
S	1737	158	1	0	0	0	0	402	0
S	1737	159	1	0	0	0	0	694	0
S	1737	160	1	1460	0	0	1241	0	0
S	1737	161	1	0	0	0	0	949	0
S	1737	162	1	0	0	0	0	949	0
S	1737	167	3	8687	256	1022	47268	8048	1
S	1737	168	2	0	0	0	0	402	2
S	1737	169	1	0	0	0	0	37	0
S	1737	170	1	0	0	0	0	37	0
S	1737	171	1	0	0	0	0	37	0
S	1737	172	0	0	0	0	0	146	2
S	1737	173	0	0	0	0	0	73	0
S	1737	174	0	0	0	0	0	73	0
S	1737	175	0	0	0	0	0	73	0
S	1737	176	0	0	0	0	0	37	0
S	1737	177	0	429	0	33	361	0	0
S	1737	178	0	3322	292	402	18104	3468	0
S	1737	180	1	19806	175	2330	107770	18350	0
SSPE (lbs)				64729	1100	12912	198140	58763	

Thursday, August 08, 2013

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Notes:

Blank values for a particular permit unit do not necessarily reflect zero emissions. For units with blank values, the PE must still be determined based on physical PE or as limited by permit condition.

For permits that show outstanding ATCs, consult PAS ATC Emission Profile records to determine what the highest PE is for each pollutant.

ATCs for new units (e.g. S-XXXX-X-0) must be added in separately.

ERC's for onsite reductions must be added in separately per Rule 2201 as well.

Attachment VI
Title V Compliance Certification Form

**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 ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: Vintage Production California LLC	FACILITY ID: S - 1737
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:	
3. Agent to the Owner:	

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).
- 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

7 - 10 - 13

Date

Stephen Bartz
Name of Responsible Official (please print)

Operations Team Lead (Central)
Title of Responsible Official (please print)

Modification of existing TVR, S-1737-168 to add two storage tanks - Rose Facility

Attachment VII HRA

San Joaquin Valley Air Pollution Control District Risk Management Review

To: Steve Davidson, AQE – Permit Services
 From: Trevor Joy, AQS – Technical Services
 Date: August 5, 2013
 Facility Name: Vintage Production
 Location: SE/4 Sec: 36 T26S R24E
 Application #(s): S-1737-185-0, and -186-0
 Project #: 1132867

A. RMR SUMMARY

Categories	Units 185-0 and 186-0 Crude Oil Tanks	Project Totals	Facility Totals
Prioritization Score	0.0	0.0	12.4
Acute Hazard Index	0.00	0.00	0.06
Chronic Hazard Index	0.00	0.00	0.06
Maximum Individual Cancer Risk (10^{-6})	0.0	0.0	2.1
T-BACT Required?	No		
Special Permit Conditions?	No		

Proposed Permit Conditions

To ensure that human health risks will not exceed District allowable levels; the following permit conditions must be included for:

Units # 185-0 and 186-0

No special conditions required.

B. RMR REPORT

I. Project Description

Technical Services received a request on July 29, 2013 to perform a Risk Management Review for the proposed installation of two new 500 BBL crude oil tanks.

II. Analysis

Technical Services performed a prioritization using the District's HEARTs database. Emissions were calculated using "Oilfield Equipment Fugitives – Heavy Crude Oil" emission factors. In accordance with the District's *Risk Management Policy for Permitting New and Modified Sources* (APR 1905, March 2, 2001), risks from the proposed units' toxic emissions were prioritized using the procedure in the 1990 CAPCOA Facility Prioritization Guidelines and incorporated in the District's HEARTs database. The prioritization score for the facility was greater than 1.0 (see RMR Summary Table). Therefore, a refined analysis was required and performed. AERMOD was used, with the parameters outlined below and concatenated meteorological data for Bakersfield 2005 to 2009 to determine the maximum dispersion factor at the nearest residential and business receptors. These dispersion factors were input into the HARP model to calculate the chronic and acute hazard indices and the carcinogenic risk for the project.

The following parameters were used for the review:

Analysis Parameter Units 185 and 186 (each)			
Closest Receptor - Business (m)	1096	Closest Receptor – Resident (m)	617
Oilfield Emissions (lbs/hr)	0.001	Oilfield Emissions (lbs/yr)	11
Tank Height (m)	4.9	Tank Diameter (m)	4.6

III. Conclusion

The acute and chronic hazard indices were below 1.0; and the cancer risk is less than or equal to 1.0 in a million. **In accordance with the District's Risk Management Policy, the project is approved without Toxic Best Available Control Technology (T-BACT).**

To ensure that human health risks will not exceed District allowable levels; the permit conditions listed on page 1 of this report must be included for this proposed unit.

These conclusions are based on the data provided by the applicant and the project engineer. Therefore, this analysis is valid only as long as the proposed data and parameters do not change.

Attachments:

- A. RMR request from the project engineer
- B. Prioritization score with toxic emissions summary
- C. HARP Risk Report
- D. Facility Summary report

Attachment VIII
Draft ATCs

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT
ISSUANCE DATE: DRAFT

PERMIT NO: S-1737-168-6

LEGAL OWNER OR OPERATOR: VINTAGE PRODUCTION CALIFORNIA LLC
MAILING ADDRESS: 9600 MING AVE, SUITE 300
BAKERSFIELD, CA 93311

LOCATION: LIGHT OIL CENTRAL
KERN COUNTY, CA

SECTION: SE36 **TOWNSHIP:** 26S **RANGE:** 24E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 126,000 GALLON FIXED ROOF CRUDE OIL GAUGE STORAGE TANK, 3-PHASE SEPARATOR, TWO HEATER TREATERS (EACH WITH BURNER(S) RATED AT 5 MMBTU/HR OR LESS), TWO 2-PHASE SEPARATORS SERVED BY VAPOR RECOVERY SYSTEM SHARED WITH TANKS S-1737-169, '-170, AND '-171. VAPOR RECOVERY SYSTEM CONSISTS OF COMPRESSOR AND ASSOCIATED PIPING DISCHARGING TO FLARES S-1737-167 AND/OR '-180 AND/OR SALES GAS LINE: CONNECT TANKS S-1737-185-0 AND '-186-0 TO THE VAPOR CONTROL SYSTEM

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Gases from the tanks, heater treaters, and all separators shall be flared or routed to a sales pipeline. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The API gravity of any organic liquid stored or processed in this tank shall be less than 30ø. [District Rules 2201 and 4409] Federally Enforceable Through Title V Permit
5. Heater treaters shall only be fired on PUC-quality natural gas or LPG. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director APCO

DRAFT

DAVID WARNER, Director of Permit Services

S-1737-168-6 : Aug 8 2013 3:00PM -- EDGEHILR : Joint Inspection NOT Required

6. The permittee shall tune the unit (two heaters) at least twice per calendar year, (from four to eight months apart) using a qualified technician in accordance with the procedure described in Rule 4304. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for a calendar year. No tune-up is required if the unit is not operated during that calendar year; and this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is complete the unit shall be shutdown. [District Rule 4307] Federally Enforceable Through Title V Permit
7. On and after July 1, 2015, the heater treaters in this unit shall comply with the applicable emission requirements of Section 5.1, Table 1 in District Rule 4307. [District Rule 4307] Federally Enforceable Through Title V Permit
8. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 99% by weight as determined by the test method specified in Section 6.4.7. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. A leak-free 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 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
11. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
12. VOC fugitive emissions from the components in gas service on tank and tank vapor collection system shall not exceed 1.12 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Permittee shall maintain accurate component count for tank according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
15. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
16. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
17. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
18. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

DRAFT

CONDITIONS CONTINUE ON NEXT PAGE

19. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
20. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
21. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
22. If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rules 2201 and 4623]
23. Permittee shall notify the APCO in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rules 4623 and 2080] Federally Enforceable Through Title V Permit
24. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rules 4623 and 2080] Federally Enforceable Through Title V Permit
25. This tank shall be degassed before commencing interior cleaning by 1) exhausting VOCs contained in the tank vapor space to an APCO-approved vapor recovery system until the organic vapor concentration is 5,000 ppmv or less, or is 10 percent or less of the lower explosion limit (LEL), whichever is less 2) by filling the tank with a suitable liquid until 90 percent or more of the maximum operating level of the tank is filled. Suitable liquids are organic liquids having a TVP of less than 0.5 psia, water, clean produced water, or produced water derived from crude oil having a TVP less than 0.5 psia. or 3) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable gas. Degassing shall continue until the operator has achieved a vapor displacement equivalent to at least 2.3 times the tank capacity. Suitable gases are air, nitrogen, carbon dioxide, or natural gas containing less than 10 percent VOC by weight. [District Rule 4623] Federally Enforceable Through Title V Permit
26. During tank degassing, the operator shall discharge or displace organic vapors contained in the tank vapor space to an APCO-approved vapor recovery system. [District Rule 4623] Federally Enforceable Through Title V Permit
27. To facilitate connection to an external APCO-approved recovery system, a suitable tank fitting, such as a manway, may be temporarily removed for a period of time not to exceed 1 hour. [District Rules 4623] Federally Enforceable Through Title V Permit
28. This tank shall be in compliance with the applicable requirements of District Rule 4623 at all times during draining, degassing, and refilling the tank with an organic liquid having a TVP of 0.5 psia or greater. [District Rule 4623] Federally Enforceable Through Title V Permit
29. While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 degrees F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 4623] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

30. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 4623] Federally Enforceable Through Title V Permit
31. The permittee shall keep accurate records of the dates of inspection and monitoring and the components inspected and monitored. [District Rule 2201] Federally Enforceable Through Title V Permit
32. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
33. The permittee shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
34. The permittee shall keep accurate records of each organic liquid stored in the tank, including its type and API gravity. [District Rules 1070, 2201 and 4409] Federally Enforceable Through Title V Permit
35. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 4623] Federally Enforceable Through Title V Permit
36. Authority to Construct S-1737-168-4 shall be implemented prior to or concurrent with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-1737-185-0

LEGAL OWNER OR OPERATOR: VINTAGE PRODUCTION CALIFORNIA LLC
MAILING ADDRESS: 9600 MING AVE, SUITE 300
BAKERSFIELD, CA 93311

LOCATION: LIGHT OIL CENTRAL
KERN COUNTY, CA

SECTION: SE 36 **TOWNSHIP:** 26S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
500 BBL CRUDE OIL STORAGE TANK CONNECTED TO THE VAPOR CONTROL SYSTEM LISTED ON PERMIT S-1737-168

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. A leak-free 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 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 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-1737-185-0 : Aug 19 2013 7:56AM -- EDGEHLR : Joint Inspection NOT Required

6. VOC fugitive emissions from the components in gas/light oil service on tank and from tank to vapor control, system trunk line shall not exceed 0.3 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Permittee shall maintain accurate component count for tank according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Federally Enforceable Through Title V Permit
8. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
11. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
12. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
13. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
14. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
15. If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rules 2201 and 4623]
16. Permittee shall notify the APCO in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rules 4623 and 2080] Federally Enforceable Through Title V Permit
17. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rules 4623 and 2080] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

18. This tank shall be degassed before commencing interior cleaning by 1) exhausting VOCs contained in the tank vapor space to an APCO-approved vapor recovery system until the organic vapor concentration is 5,000 ppmv or less, or is 10 percent or less of the lower explosion limit (LEL), whichever is less 2) by filling the tank with a suitable liquid until 90 percent or more of the maximum operating level of the tank is filled. Suitable liquids are organic liquids having a TVP of less than 0.5 psia, water, clean produced water, or produced water derived from crude oil having a TVP less than 0.5 psia. or 3) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable gas. Degassing shall continue until the operator has achieved a vapor displacement equivalent to at least 2.3 times the tank capacity. Suitable gases are air, nitrogen, carbon dioxide, or natural gas containing less than 10 percent VOC by weight. [District Rule 4623] Federally Enforceable Through Title V Permit
19. During tank degassing, the operator shall discharge or displace organic vapors contained in the tank vapor space to an APCO-approved vapor recovery system. [District Rule 4623] Federally Enforceable Through Title V Permit
20. To facilitate connection to an external APCO-approved recovery system, a suitable tank fitting, such as a manway, may be temporarily removed for a period of time not to exceed 1 hour. [District Rules 4623] Federally Enforceable Through Title V Permit
21. This tank shall be in compliance with the applicable requirements of District Rule 4623 at all times during draining, degassing, and refilling the tank with an organic liquid having a TVP of 0.5 psia or greater. [District Rule 4623] Federally Enforceable Through Title V Permit
22. While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 degrees F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 4623] Federally Enforceable Through Title V Permit
23. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 4623] Federally Enforceable Through Title V Permit
24. The permittee shall keep accurate records of the dates of inspection and monitoring and the components inspected and monitored. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
26. The permittee shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
27. ATC shall be implemented concurrently with or subsequent to ATC S-1738-168-6. [District Rule 2201] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1737-186-0

LEGAL OWNER OR OPERATOR: VINTAGE PRODUCTION CALIFORNIA LLC
MAILING ADDRESS: 9600 MING AVE, SUITE 300
BAKERSFIELD, CA 93311

LOCATION: LIGHT OIL CENTRAL
KERN COUNTY, CA

SECTION: SE 36 **TOWNSHIP:** 26S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
500 BBL CRUDE OIL STORAGE TANK CONNECTED TO THE VAPOR CONTROL SYSTEM LISTED ON PERMIT S-1737-168

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. A leak-free 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 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 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 YAPCO

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DAVID WARNER, Director of Permit Services
S-1737-186-0: Aug 19 2013 7:57AM -- EDGEHILR : Joint Inspection NOT Required

6. VOC fugitive emissions from the components in gas/light oil service on tank and from tank to vapor control, system trunk line shall not exceed 0.3 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Permittee shall maintain accurate component count for tank according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Federally Enforceable Through Title V Permit
8. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
11. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
12. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
13. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
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