



MAR 09 2015

Mr. Jerry Frost
California Resources Production Corp
9600 Ming Avenue, Suite 300
Bakersfield, CA 93311

Re: Notice of Minor Title V Permit Modification
District Facility # S-1327
Project # S-1142367

Dear Mr. Frost:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued ATC S-1327-147-0 (under project S-1110574) into the Title V operating permit. The ATC involves permitting one (1) new 10,000 bbl fixed roof crude oil stock tank T-130 served by the vapor control system listed on permit S-1327-126.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATC S-1327-147-0, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

Thank you for your cooperation in this matter.

Sincerely,


Arnaud Marjollet
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) 230-8000 FAX: (559) 230-6061

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

TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1142367

Engineer: Stephen Leonard
Date: March 3, 2015

Facility Number: S-1327
Facility Name: California Resources Production Corp.
Mailing Address: 9600 Ming Ave, Suite 300
Bakersfield, CA 93311

Reviewed by ASURP AQE

MAR 03 2015

Contact Name: Jerry Frost
Phone: 661-412-5309

Responsible Official: Dewayne Smith
Title: Surface Operations Manager

I. PROPOSAL

California Resources Production Corp. (CRPC) is proposing a Title V minor permit modification to incorporate Authority to Construct (ATC) document S-1327-147-0 into the Title V operating permit. The ATC involves permitting one (1) new 10,000 bbl fixed roof crude oil stock tank T-130 served by the vapor control system listed on permit S-1327-126 (Lost Hills Processing Plant).

This Title V application was originally submitted when the subject tanks were issued ATC's and constructed as part of Vintage Production California LLC. Vintage Production facility S-1327 has since undergone a name change to California Resources Production Corporation. Ownership is the same and the new permits will be issued under the California Resources name.

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

II. FACILITY LOCATION

The crude oil processing tank is located at NW ¼ Section 02, Township 26S, Range 20E, within the California Resources Production Corporation's Heavy Oil Western Stationary Source.

III. EQUIPMENT DESCRIPTION

S-1327-147-2: 10,000 BBL FIXED ROOF CRUDE OIL STOCK TANK T-130
SERVED BY VAPOR CONTROL SYSTEM LISTED ON PERMIT S-
1327-126 (LOST HILLS PROCESSING PLANT)

IV. SCOPE OF EPA AND PUBLIC REVIEW

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

V. APPLICABLE REQUIREMENTS

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

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

The ATC was for a new permit unit. There are no modifications to existing permit units.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

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

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

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

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit Unit S-1327-147-2
- B. Authority to Construct S-1327-147-0
- C. Emissions Increases
- D. Application

ATTACHMENT A

**Proposed Modified Title V Operating Permit Unit
S-1327-147-2**

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1327-147-2

EXPIRATION DATE: 02/28/2017

SECTION: NW02 TOWNSHIP: 26S RANGE: 20E

EQUIPMENT DESCRIPTION:

10,000 BBL FIXED ROOF CRUDE OIL STOCK TANK T-130 SERVED BY VAPOR CONTROL SYSTEM LISTED ON PERMIT S-1327-126 (LOST HILLS PROCESSING PLANT)

PERMIT UNIT REQUIREMENTS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. 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
3. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
4. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 2201] Federally Enforceable Through Title V Permit
6. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Operator shall conduct quarterly gas sampling to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [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.

12. 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 Rule 2080] Federally Enforceable Through Title V Permit
13. This tank shall be degassed before commencing interior cleaning by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system 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. [District Rule 2080] Federally Enforceable Through Title V Permit
14. 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 2080] Federally Enforceable Through Title V Permit
15. 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 Rule 2080] Federally Enforceable Through Title V Permit
16. After a tank has been degassed pursuant to the requirements of this permit, vapor control requirements are not applicable until an organic liquid having a TVP of 0.5 psia or greater is placed, held, or stored in this tank. [District Rule 2080] Federally Enforceable Through Title V Permit
17. 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 2080] Federally Enforceable Through Title V Permit
18. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 2080] Federally Enforceable Through Title V Permit
19. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

DRAFT

ATTACHMENT B

Authority to Construct S-1327-147-0



AUTHORITY TO CONSTRUCT

PERMIT NO: S-1327-147-0

ISSUANCE DATE: 04/28/2011

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

LOCATION: HEAVY OIL WESTERN, KERN COUNTY
CA

SECTION: NW02 TOWNSHIP: 26S RANGE: 20E

EQUIPMENT DESCRIPTION:

10,000 BBL FIXED ROOF CRUDE OIL STOCK TANK T-130 SERVED BY VAPOR CONTROL SYSTEM LISTED ON PERMIT S-1326-126 - REISSUE OF S-4073-45-0 FOLLOWING TRANSFER OF OWNERSHIP

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. 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]
3. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623]
4. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 2201]
5. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 2201]
6. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 2201]

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.

Sayed Sadredin, Executive Director / APCO



DAVID WARNER, Director of Permit Services

S-1327-147-0: Apr 28 2011 5:30PM - LEONARDS : Joint Inspection NOT Required

7. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 2201]
8. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 2201]
9. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 2201]
10. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201]
11. Operator shall conduct quarterly gas sampling to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201]
12. 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 Rule 2080]
13. This tank shall be degassed before commencing interior cleaning by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system 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. [District Rule 2080]
14. 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 2080]
15. 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 Rule 2080]
16. After a tank has been degassed pursuant to the requirements of this permit, vapor control requirements are not applicable until an organic liquid having a TVP of 0.5 psia or greater is placed, held, or stored in this tank. [District Rule 2080]
17. 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 2080]
18. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 2080]
19. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

ATTACHMENT C

Emissions Increases

California Resources Production Corp.
S-1327; S1142367

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
S-1327-147-2	0	0	0	0	0

ATTACHMENT D

Application



Vintage Production California LLC

A subsidiary of Occidental Petroleum Corporation 

9600 Ming Ave, Ste. 300
Bakersfield, California 93311
Phone 661.869.8000, Fax 661.869.8059

RECEIVED

MAY 22 2014

SJVAPCD
Southern Region

May 21, 2014

Mr. Leonard Scandura
Permit Services Manager
San Joaquin Valley Unified APCD
34946 Flyover Court
Bakersfield, CA 93308

Subject: Title V Modification S-1327

Dear Mr. Scandura:

Please find enclosed a Title V Minor Modification application and a check in the amount of \$19 to incorporate ATC S-1327-147-0 into the current Title V operating permit for the Vintage Production California, LLC (VPC) Heavy Oil Western Stationary Source (S-1327).

If you have any questions or comments please feel free to contact Jerry Frost at (661) 869-8000.

Sincerely,



Jerry Frost
HES Advisor

Attachments

San Joaquin Valley Air Pollution Control District

www.valleyair.org

RECEIVED
MAY 22 2014
SJVAPCD
Southern Region

Permit Application For:

ADMINISTRATIVE
AMENDMENT

MINOR
MODIFICATION

SIGNIFICANT
MODIFICATION

1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">Vintage Production California LLC</p>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>9600 Ming Ave</u> CITY: <u>Bakersfield</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93311</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: _____ CITY: _____ <u>NW</u> ¼ SECTION <u>2</u> TOWNSHIP <u>26S</u> RANGE <u>20E</u>	INSTALLATION DATE: <p style="text-align: center;">5/21/2014</p>
4. GENERAL NATURE OF BUSINESS: <u>Crude Oil Production</u>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Title V Minor Modification to incorporate ATC S-1327-147-0 as a PTO into the current Title V operating permit for S-1327.	
6. TYPE OR PRINT NAME OF APPLICANT: <p style="text-align: center;">Jerry Frost</p>	TITLE OF APPLICANT: <p style="text-align: center;">HES Advisor</p>
7. SIGNATURE OF APPLICANT: 	DATE: <u>5-21-14</u> PHONE: (661) 869-8000 FAX: (661) 869-8059 EMAIL: <u>Jerry.Frost@oxy.com</u>

For APCD Use Only:

EnviroTech Consultants Inc.

DATE STAMP	FILING FEE RECEIVED: \$ <u>19.00</u> CHECK#: <u>4306</u> DATE PAID: <u>PM 5/22/14</u> PROJECT NO: <u>S-1142307</u> FACILITY ID: <u>S-1327</u>
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**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

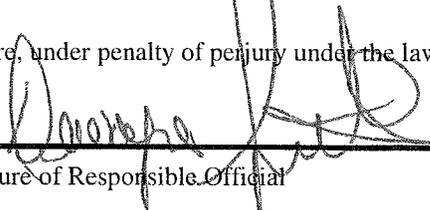
- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: VINTAGE PRODUCTION CALIFORNIA, LLC	FACILITY ID: S - 1327
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: VINTAGE PRODUCTION CALIFORNIA, LLC	
3. Agent to the Owner: VINTAGE PRODUCTION CALIFORNIA, LLC	

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

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment 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

5/21/14

Date

Dewayne Smith

Name of Responsible Official (please print)

Surface Operations Manager

Title of Responsible Official (please print)

Mailing Address: Central Regional Office * 1990 E. Gettysburg Avenue * Fresno, California 93726-0244 * (559) 230-5900 * FAX (559) 230-6061