



Proposed

Part 70 Minor Permit Modification 12273

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EQUIPMENT OWNER:

BreitBurn Energy Company LP

300000

EQUIPMENT OPERATOR:

BreitBurn Energy Company LP

EQUIPMENT LOCATION:

Newlove Lease, Orcutt Hill Oil Field, Santa Barbara County, California

STATIONARY SOURCE/FACILITY:

BreitBurn Energy- Orcutt Hill
Newlove Lease

SSID: 02667
FID: 03321

EQUIPMENT DESCRIPTION:

Wash tank, 3,000 barrel capacity, 29.7 feet diameter by 24 feet high, connected to a vapor recovery system.

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CONDITIONS:

9.A Standard Administrative Conditions

The following federally-enforceable administrative permit conditions apply to the Newlove Lease:

A.1 Compliance with Permit Conditions

- (a) The permittee shall comply with all permit conditions in Sections 9.A, 9.B and 9.C.
- (b) This permit does not convey property rights or exclusive privilege of any sort.
- (c) Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.
- (d) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (e) A pending permit action or notification of anticipated noncompliance does not stay any permit condition.
- (f) Within a reasonable time period, the permittee shall furnish any information requested by the Control Officer, in writing, for the purpose of determining:
 - (i) compliance with the permit, or
 - (ii) whether or not cause exists to modify, revoke and reissue, or terminate a permit or for an enforcement action. [*Re: 40 CFR Part 70.6, APCD Rules 1303.D.1*]
- (g) In the event that any condition herein is determined to be in conflict with any other condition contained herein, then, if principles of law do not provide to the contrary, the condition most protective of air quality and public health and safety shall prevail to the extent feasible.

A.2 Emergency Provisions. The permittee shall comply with the requirements of the APCD, Rule 505 (Upset/Breakdown rule) and/or APCD Rule 1303.F, whichever is applicable to the emergency situation. In order to maintain an affirmative defense under Rule 1303.F, the permittee shall provide the APCD, in writing, a “notice of emergency” within 2 days of the emergency. The “notice of emergency” shall contain the information/documentation listed in Sections (1) through (5) of Rule 1303.F. [*Re: 40 CFR 70.6, APCD Rule 1303.F*]

A.3 Compliance Plan.

- (a) The permittee shall comply with all federally-enforceable requirements that become applicable during the permit term, in a timely manner, as identified in the Compliance Plan.

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- (b) For all applicable equipment, the permittee shall implement and comply with any specific compliance plan required under any federally-enforceable rules or standards. [*Re: APCD Rule 1302.D.2*]
- A.4 **Right of Entry.** The Regional Administrator of USEPA, the Control Officer, or their authorized representatives, upon the presentation of credentials, shall be permitted to enter upon the premises where a Part 70 Source is located or where records must be kept:
 - (a) To inspect the stationary source, including monitoring and control equipment, work practices, operations, and emission-related activity;
 - (b) To inspect and duplicate, at reasonable times, records required by this Permit to Operate;
 - (c) To sample substances or monitor emissions from the source or assess other parameters to assure compliance with the permit or applicable requirements, at reasonable times. Monitoring of emissions can include source testing. [*Re: APCD Rule 1303.D.2*]
- A.6 **Payment of Fees.** The permittee shall reimburse the APCD for all its Part 70 permit processing and compliance expenses for the stationary source on a timely basis. Failure to reimburse on a timely basis shall be a violation of this permit and of applicable requirements and can result in forfeiture of the Part 70 permit. Operation without a Part 70 permit subjects the source to potential enforcement action by the APCD and the USEPA pursuant to section 502(a) of the Clean Air Act. [*Re: APCD Rules 1303.D.1 and 1304.D.11, 40 CFR 70.6*]
- A.7 **Prompt Reporting of Deviations:** The permittee shall submit a written report to the APCD documenting each and every deviation from the requirements of this permit or any applicable federal requirements within 7 days after discovery of the violation, but not later than 180-days after the date of occurrence. The report shall clearly document 1) the probable cause and extent of the deviation, 2) equipment involved, 3) the quantity of excess pollutant emissions, if any, and 4) actions taken to correct the deviation. The requirements of this condition shall not apply to deviations reported to APCD in accordance with Rule 505. *Breakdown Conditions*, or Rule 1303.F *Emergency Provisions*. [APCD Rule 1303.D.1, 40 CFR 70.6(a) (3)]
- A.8 **Reporting Requirements/Compliance Certification:** The permittee shall submit compliance certification reports to the USEPA and the Control Officer every six months. These reports shall be submitted on APCD forms and shall identify each applicable requirement/condition of the permit, the compliance status with each requirement/condition, the monitoring methods used to determine compliance, whether the compliance was continuous or intermittent, and include detailed information on the occurrence and correction of any deviations (excluding emergency upsets) from permit requirement. The reporting periods shall be each half of the calendar year, e.g., January through June for the first half of the year. These reports shall be submitted by September 1 and March 1, respectively, each year. Supporting monitoring data shall be submitted in accordance with the “Semi-

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Annual Monitoring/Compliance Verification Report” condition in section 9.C. The permittee shall include a written statement from the responsible official, which certifies the truth, accuracy, and completeness of the reports. [Re: APCD Rules 1303.D.1, 1302.D.3, 1303.2.c]

A.9 **Federally-Enforceable Conditions.** Each federally-enforceable condition in this permit shall be enforceable by the USEPA and members of the public. None of the conditions in the APCD-only enforceable section of this permit are federally-enforceable or subject to the public/USEPA review. [Re: CAAA, § 502(b)(6), 40 CFR 70.6]

A.10 **Recordkeeping Requirements.** Records of required monitoring information shall include the following:

- (a) The date, place as defined in the permit, and time of sampling or measurements;
- (b) The date(s) analyses were performed;
- (c) The company or entity that performed the analyses;
- (d) The analytical techniques or methods used;
- (e) The results of such analyses; and
- (f) The operating conditions as existing at the time of sampling or measurement;

The records (electronic or hard copy), as well as all supporting information including calibration and maintenance records, shall be maintained for a minimum of five (5) years from date of initial entry by the permittee and shall be made available to the APCD upon request. [Re: APCD Rule 1303.D.1.f, 40CFR70.6(a)(3)(ii)(A)]

A.11 **Conditions for Permit Reopening.** The permit shall be reopened and revised for cause under any of the following circumstances:

- (a) Additional Requirements: If additional applicable requirements (e.g., NSPS or MACT) become applicable to the source which has an unexpired permit term of three (3) or more years, the permit shall be reopened. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. However, no such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended. All such reopenings shall be initiated only after a 30-day notice of intent to reopen the permit has been provided to the permittee, except that a shorter notice may be given in case of an emergency.
- (b) Inaccurate Permit Provisions: If the APCD or the USEPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit, the permit shall be reopened. Such re-openings shall be made as soon as practicable.
- (c) Applicable Requirement: If the APCD or the USEPA determines that the permit must be revised or revoked to assure compliance with any applicable requirement including a federally-

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enforceable requirement, the permit shall be reopened. Such re-openings shall be made as soon as practicable.

Administrative procedures to reopen and revise/revoke/reissue a permit shall follow the same procedures as apply to initial permit issuance. Re-openings shall affect only those parts of the permit for which cause to reopen exists.

If a permit is reopened, the expiration date does not change. Thus, if the permit is reopened, and revised, then it will be reissued with the expiration date applicable to the re-opened permit. [*Re: 40 CFR 70.7, 40 CFR 70.6*]

- A.12 **Grounds for Revocation.** Failure to abide by and faithfully comply with this permit or any Rule, Order, or Regulation may constitute grounds for the APCO to petition for permit revocation pursuant to California Health & Safety Code Section 42307 *et seq.*

9.B. Generic Conditions

- B.1 **Circumvention (Rule 301):** A person shall not build, erect, install, or use any article, machine, equipment or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Division 26 (Air Resources) of the Health and Safety Code of the State of California or of these Rules and Regulations. This Rule shall not apply to cases in which the only violation involved is of Section 41700 of the Health and Safety Code of the State of California, or of APCD Rule 303. [*Re: APCD Rule 301*]

- B.3 **Nuisance (Rule 303):** No pollutant emissions from any source at the permittee shall create nuisance conditions. Operations shall not endanger health, safety or comfort, nor shall they damage any property or business. [*Re: APCD Rule 303*]

9.C Requirements and Equipment Specific Conditions

This condition supersedes the same numbered condition in PTO/Part-70 Permit 8226-R7. Tables 5.1-1 through 5.1-4 in PTO/Part-70 Permit 8226-R7 are also superseded by Tables 5.1-1 through 5.1-4 of this permit.

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C.2 **Petroleum Storage and Processing Tanks.** The following equipment is included in this emissions category:

Dev No	Equipment Name; Capacity
002973	Wash Tank, 3,000 bbl capacity
109949	Wash Tank, 3,000 bbl capacity
002979	Wash Tank, 3,000 bbl capacity
002974	Crude Storage Tank, 1,000 bbl capacity

- (a) Emission Limits: Mass emission for the tanks listed above shall not exceed the limits listed in Tables 5.1-3 and 5.1-4.

- (b) Operational Limits:
 - (i) All process operations from the equipment listed in this section shall meet the requirements of APCD Rules 325 Sections D, E, F and G. Rule 325.D require the tanks to be connected to vapor collection and removal device(s) prior to their operation, and the vapor removal efficiencies to be no less than 90-percent. Compliance with these limits shall be assessed through compliance with the monitoring, recordkeeping and reporting conditions in this permit.

 - (ii) *Emission Reduction Credits: Real, Surplus, Quantifiable and Enforceable*: The emission reductions created by the control of four tanks (Dev Nos 002974, 002973, 109949, and 002979) are for use as offsets for the Point Pedernales Project to meet the requirements under PTO 6708. Emission reduction measures (i.e. vapor recovery with a control efficiency maintained at 95% or greater) implemented to create the required emission reductions shall be in place and maintained for the life of the Project.

To assure that offsets are real, quantifiable, surplus and enforceable, the permittee shall not utilize a shift in load from the controlled tanks subject to this permit to other uncontrolled point sources at the stationary source as a means of generating additional emission reduction credits (ERCs). For the purposes of this condition, shift in load is defined as a redirecting of produced fluids from a controlled source to an uncontrolled source for the sole purpose of increasing the uncontrolled source baseline throughput resulting in the generation of false surplus ERC's. If such shift in load does occur, the increased emissions at the uncontrolled point source shall not be considered in any baseline calculation for possible ERC for that uncontrolled point source and the ERCs provided by this permit to the Point Pedernales project shall become invalid.

- (iii) Pursuant to Rule 343, Sections D, E, F and G, the permittee shall use a control device, approved in advance by the APCD, when degassing or purging any stationary tanks, vessels, or containers which process odorous sulfur compounds. Except for emergency

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cases, the Control Officer shall be notified in writing at least two weeks prior to the start of the emptying operation for the purpose of degassing any above-ground tank subject to this rule.

- (c) Monitoring: The equipment listed in this section shall be subject to all the monitoring requirements of APCD Rule 325.H. The test methods outlined in APCD Rule 325.G shall be used, when applicable. In addition, the permittee shall, for all degassing events, monitor the volume purged, characteristics of the vapor purged, and control device/method used.
- (d) Recordkeeping: The equipment listed in this section is subject to all the recordkeeping requirements listed in APCD Rule 325.F. In addition, the permittee shall maintain a log of all degassing events in accordance Rule 343.F.
- (e) Reporting: On a semi-annual basis, a report detailing the previous six-month's activities shall be provided to the APCD. The report must list all data required by the *Semi-Annual Compliance Verification Reports* condition of this permit.

[Re: 40 CFR 70.6, APCD Rules 206, 325, 343 and 1303]

AIR POLLUTION CONTROL OFFICER

DATE

Notes:

1. When issued, this permit supersedes ATC 12273 issued July 27, 2007.
2. Next Reevaluation Due: March 2009

Attachment: Permit Evaluation for PTO 12273

**Table 5.1-1
BreitBurn Newlove Lease: Permit to Operate 8240-R6
Operating Equipment Description**

Equipment Category	Description	Dev No	Device Specifications			Usage Data		Maximum Operating Schedule					References	
			Feed	Parameter	Size	Units	Capacity	Units	Load	hr	day	qtr		year
				<u>TVP</u>										
Tanks	Wash Tank	002973	O/W	2.420	3,000 bbls	1,100	bbl/day	1.0	1.0	24	2,190	8,760	A	
	Wash Tank	109949	O/W	2.420	3,000 bbls	1,100	bbl/day	1.0	1.0	24	2,190	8,760	A	
	Wash Tank	002979	O/W	2.420	3,000 bbls	1,100	bbl/day	1.0	1.0	24	2,190	8,760	A	
	Crude Tank	002974	Oil	2.420	1,000 bbls	1,100	bbl/day	1.0	1.0	24	2,190	8,760	A	
	Wastewater Tank	008206	Water	2.420	1,000 bbls	--	--	1.0	1.0	24	2,190	8,760	B	
				<u>Service</u>										
Pits and Sumps	Well Cellars	003041	O/W	Primary	1,044 ft ²	--	--	1.0	1.0	24	2,190	8,760	B	
	Pits	Note A	O/W	Secondary	75 ft ²	--	--	1.0	1.0	24	2,190	8,760	B	
	Spill Catch Pan	101177	O/W	Primary	5 ft ²	--	--	1.0	1.0	24	2,190	8,760	B	
Fugitive Components	Valves, Connections, etc	002980	--	--	56 wells	--	--	1.0	1.0	24	2,190	8,760	C	
	Pumps/Compressors/Wellheads	003042	--	--	56 wells	--	--	1.0	1.0	24	2,190	8,760	C	

Note A: Device Number Pits are 101173, 101174, 101175, 101178, 101184, 101185

**Table 5.1-2
BreitBurn Newlove Lease: Permit to Operate 8240-R6
Equipment Emission Factors**

			Emission Factors						
Equipment Category	Description	Dev No	NO _x	ROC	CO	SO _x	PM	PM ₁₀	Units
Tanks	Wash Tank	002973	See attached worksheets for emission factors.						
	Wash Tank	109949							
	Wash Tank	002979							
	Crude Tank	002974							
	Wastewater Tank	008206							
Pits and Sumps	Well Cellars	003041	--	0.0282	--	--	--	--	lb/ft ² -day
	Pits	Note A	--	0.0126	--	--	--	--	lb/ft ² -day
	Spill Catch Pan	101177	--	0.0941	--	--	--	--	lb/ft ² -day
Fugitive Components	Valves, Connections, etc	002980	--	--	--	--	--	--	--
	Pumps/Compressors/Wellheads	003042	--	--	--	--	--	--	--

**Table 5.1-3
BreitBurn Newlove Lease: Permit to Operate 8240-R6
Hourly and Daily Emissions**

Equipment Category	Description	Dev No	NO _x		ROC		CO		SO _x		PM		PM ₁₀		Enforceability	
			lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	Type	Basis
Tanks	Wash Tank	002973	--	--	0.00	0.04	--	--	--	--	--	--	--	--	FE	PTO 8240R6
	Wash Tank	109949	--	--	0.00	0.04	--	--	--	--	--	--	--	--	FE	ATC 6416
	Wash Tank	002979	--	--	0.00	0.04	--	--	--	--	--	--	--	--	FE	ATC 6416
	Crude Tank	002974	--	--	0.02	0.58	--	--	--	--	--	--	--	--	FE	ATC 6416
	Wastewater Tank	008206	--	--	0.01	0.23	--	--	--	--	--	--	--	--	FE	ATC 9248
Pits and Sumps	Well Cellars	003041	--	--	1.23	29.47	--	--	--	--	--	--	--	--	A	--
	Pits	Note A	--	--	0.04	0.94	--	--	--	--	--	--	--	--	A	--
	Spill Catch Pan	101177	--	--	0.02	0.50	--	--	--	--	--	--	--	--		
Fugitive Components	Valves, Connections, etc	002980	--	--	1.96	47.14	--	--	--	--	--	--	--	--	A	--
	Pumps/Compressors/Wellheads	003042	--	--	0.04	0.91	--	--	--	--	--	--	--	--	A	--

Notes:

- A = APCD enforceable emission limit.
- FE = Federally enforceable emission limit.

**Table 5.1-4
BreitBurn Newlove Lease: Permit to Operate 8240-R6
Quarterly and Annual Emissions**

Equipment Category	Description	Dev No	NO _x		ROC		CO		SO _x		PM		PM ₁₀		Enforceability	
			TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	Type	Basis
Tanks	Wash Tank	002973	--	--	0.00	0.01	--	--	--	--	--	--	--	--	FE	PTO 8240R6
	Wash Tank	109949	--	--	0.00	0.01	--	--	--	--	--	--	--	--	FE	ATC 6416
	Wash Tank	002979	--	--	0.00	0.01	--	--	--	--	--	--	--	--	FE	ATC 6416
	Crude Tank	002974	--	--	0.03	0.11	--	--	--	--	--	--	--	--	FE	ATC 6416
	Wastewater Tank	008206	--	--	0.01	0.04	--	--	--	--	--	--	--	--	FE	ATC 9248
Pits and Sumps	Well Cellars	003041	--	--	1.34	5.38	--	--	--	--	--	--	--	--	A	--
	Pits	Note A	--	--	0.04	0.17	--	--	--	--	--	--	--	--	A	--
	Spill Catch Pan	101177	--	--	0.02	0.09	--	--	--	--	--	--	--	--	A	--
Fugitive Components	Valves, Connections, etc	002980	--	--	2.15	8.60	--	--	--	--	--	--	--	--	A	--
	Pumps/Compressors/Wellheads	003042	--	--	0.04	0.17	--	--	--	--	--	--	--	--	A	--

Notes:

- A = APCD enforceable emission limit.
- FE = Federally enforceable emission limit.

Equipment List

PTO 12273 / FID: 03321 Newlove Lease / SSID: 02667

A PERMITTED EQUIPMENT

1 Wash Tank

<i>Device ID #</i>	109949	<i>Device Name</i>	Wash Tank
<i>Rated Heat Input</i>		<i>Physical Size</i>	3000.00 BBL
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	29.7' dia. by 24' high, connected to the vapor recovery system.		

E DE-PERMITTED EQUIPMENT

1 Wash Tank

<i>Device ID #</i>	002978	<i>Device Name</i>	Wash Tank
<i>Rated Heat Input</i>		<i>Physical Size</i>	3000.00 BBL
<i>Manufacturer</i>		<i>Operator ID</i>	5564
<i>Model</i>		<i>Serial Number</i>	
<i>Depermitted</i>		<i>Facility Transfer</i>	
<i>Device Description</i>	29.7' dia. by 24' high, connected to the vapor recovery system.		



PERMIT EVALUATION FOR
PERMIT TO OPERATE 12273

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1.0 BACKGROUND

- 1.1 General: BreitBurn filed Permit to Operate Application 12273 on February 5, 2008 to authorized the operation of the replacement 3,000 bbl wash tank on the Newlove Lease previously permitted under ATC 12273. The new wash tank is of identical dimensions and function as the tank replaced. As found in the SCDP inspection, all piping is in place and no new fugitive components were installed as part of this project.

Under permit condition 9.C.2.(b) (ii), the emission reductions from the installation of vapor recovery on the existing wash tank and other tanks in the Newlove tank battery were used as offsets for the Point Pedernales Project to meet the requirements under PTO 6708. Since the replacement wash tank is of identical dimensions and will be controlled by vapor recovery, the emission reductions remain the same and therefore the offset requirement under permit condition 9.C.2.(b) (ii) continue to be valid.

- 1.2 Permit History: A comprehensive permitting history of this facility may be found in section 1.2.2 of Part 70 Operating Permit and Permit to Operate 8240-R6.
- 1.3 Compliance History: See Section 3.5 of Part 70 Operating Permit and Permit to Operate 8240-R6.

2.0 ENGINEERING ANALYSIS

- 2.1 Equipment/Processes: The wash tank is used for processing of production crude.
- 2.2 Emission Controls: The new tank is equipped with a vapor recovery system. A 95-percent control efficiency is applied for the use of vapor recovery.
- 2.3 Emission Factors: Emission factors for each equipment item are documented in the attached emission calculation worksheets.
- 2.4 Reasonable Worst Case Emission Scenario: Worst case emissions are based on operation of this facility 24 hours/day, 365 days per year at maximum permitted throughput levels.
- 2.5 Emission Calculations: Detailed emission calculation spreadsheets may be found in Attachment "A". These emissions define the Potential to Emit for the permitted equipment.
- 2.6 Special Calculations: There are no special calculations.

PERMIT EVALUATION FOR
PERMIT TO OPERATE 12273

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- 2.7 BACT Analyses: Best Available Control Technology was not required for this project.
- 2.8 Enforceable Operational Limits: The permit has enforceable operating conditions that ensure the control device is operated properly.
- 2.9 Monitoring Requirements: Monitoring of the equipment's operational limits are required to ensure that these are enforceable. This permit requires monitoring the parameters required by APCD Rules 325.F, 331.G, 343.F.
- 2.10 Recordkeeping and Reporting Requirements: The permit requires that the data which is monitored be recorded and reported to the APCD.

3.0 REEVALUATION REVIEW (not applicable)

4.0 REGULATORY REVIEW

- 4.1 Partial List of Applicable Rules: This project is anticipated to operate in compliance with the following rules:

- Rule 101. Compliance of Existing Facilities
- Rule 202. Exemptions to Rule 201
- Rule 205. Standards for Granting Permits
- Rule 303. Nuisance
- Rule 325. Crude Oil Production and Separation
- Rule 331. Fugitive Emissions Inspection and Maintenance
- Rule 343. Petroleum Storage tank Degassing
- Rule 505. Breakdown Procedures
- Rule 801. New Source Review
- Rule 802. Nonattainment Review
- Rule 803. Prevention of Significant Deterioration

- 4.2 Rules Requiring Review: None

- 4.3 NEI Calculations: The Regulation VIII emission offset thresholds for NO_x and ROC are exceeded for the Diatomite Project permitted under ATC 12084 based on the NEI for Phase 1 and 2 of the project. However, the Diatomite Project is currently exercising Phase 1 of the project only, and offsets were not required for Phase 1.

An adjustment to the facility and stationary source NEI must be made to appropriately track offset requirements on all future projects. As part of the Engineering Evaluation for this permitting action, the facility and stationary source NEI tables for the Newlove Lease facility now contain two separate NEI totals. The unadjusted facility and stationary source NEI includes the NEI contributions from both Phase 1 and 2 of ATC 12084. The adjusted facility and stationary source NEI omits the Phase 2 emissions portion of ATC 12084 and reflects the NEI emissions from Phase 1 only. This adjusted version will be used to determine if future permitting actions trigger offset requirements until such time as Phase 2 construction begins. At that time, offset determinations will be based on the unadjusted NEI and the adjusted NEI will no longer be applicable. If Phase 2 is never implemented, then the NEI will revert to the adjusted NEI track.

PERMIT EVALUATION FOR
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For this permitting action, the net emission increase calculation is used to determine whether certain requirements must be applied to a project (e.g., offsets, AQIA, PSD BACT). The NEI values for the stationary source (the I, P1, P2 and D terms of the NEI calculation) are documented in Attachment "B". A "D" term was granted for the replaced tank. This tank was verified to have operated continuously the past 3 years. The "D" term is equivalent to the "I" term for the new tank, therefore there is no increase in facility or stationary source NEI.

5.0 AQIA

The project is not subject to the Air Quality Impact Analysis requirements of Regulation VIII.

6.0 OFFSETS/ERCs

6.1 General: The emission offset thresholds of Regulation VIII are not exceeded.

6.2 Offsets: Offsets are not required for this permitting action.

6.3 ERCs: This source does not generate emission reduction credits

7.0 AIR TOXICS

An air toxics health risk assessment was not performed for this permitting action.

8.0 CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REVIEW:

This project is exempt from CEQA pursuant to the Environmental Review Guidelines for the Santa Barbara County APCD (revised November 16, 2000). Appendix A.1 (*APCD Projects Exempt from CEQA*) specifically exempts permits to operate.

9.0 SCHOOL NOTIFICATION PROCESS

A school notice pursuant to the requirements of H&SC §42301.6 was not required.

10.0 PUBLIC and AGENCY NOTIFICATION PROCESS/COMMENTS ON DRAFT PERMIT

This project was not subject to public notice. The permittee was issued a draft Permit to Operate on February 21, 2008 and responded with no comments in a letter dated March 4, 2008.

11.0 FEE DETERMINATION

Fees for the APCD's work efforts are assessed on a fee basis. The Project Code is 300000 (*Oil & Gas*). The fee calculations may be found in Attachment "C".

**PERMIT EVALUATION FOR
PERMIT TO OPERATE 12273**

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12.0 RECOMMENDATION

It is recommended that this permit be granted with the conditions as specified in the permit.

Al Ronyecz			
AQ Engineer	Date	Engineering Supervisor	Date

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ATTACHMENTS

- A Emission Calculations
- B Facility/Stationary Source NEI
- C Fee Calculations
- D IDS Tables

ATTACHMENT A
Emission Calculations

FIXED ROOF TANK CALCULATION (AP-42: Chapter 7 Method)

Basic Input Data	
liquid (1:G13, 2:G10, 3:G7, 4:C, 5:JP, 6:ker, 7:O2, 8:O6) =	4
liquid TVP =	3.2
if TVP is entered, enter TVP temperature (*F) =	120
tank heated (yes, no) =	no
if tank is heated, enter temp (*F) =	
vapor recovery system present? (yes, no) =	yes
is this a wash tank? (yes, no) =	yes
will flashing losses occur in this tank? (yes, no) =	no
breather vent pressure setting range (psi) (def = 0.06):	0.06

Attachment: B
 Permit: PTO 12273
 Date: 02/06/08
 Tank: Wash Tank
 Name: Newlove Lease
 Filename:
 District: Santa Barbara
 Version: Tank-2b.xls

PRINT

Tank Data	
diameter (feet) =	29.7
capacity (enter barrels in first col, gals will compute) =	3,000 126,000
conical or dome roof? (c, d) =	c
shell height (feet) =	24
roof height (def = 1):	1
ave liq height (feet):	23
color (1:Spec Al, 2:Diff Al, 3:Lite, 4:Med, 5:Rd, 6:Wh) =	4
condition (1: Good, 2: Poor) =	1
upstream pressure (psig) (def = 0 when no flashing occurs):	0

paint color	Paint Factor Matrix	
	paint condition	
	good	poor
spec alum	0.39	0.49
diff alum	0.60	0.68
lite grey	0.54	0.63
med grey	0.68	0.74
red	0.89	0.91
white	0.17	0.34

Molecular Weight Matrix	
liquid	mol wt
gas rvp 13	62
gas rvp 10	66
gas rvp 7	68
crude oil	50
JP-4	80
jet kerosene	130
fuel oil 2	130
fuel oil 6	190

Liquid Data		
	A	B
maximum daily throughput (bopd) =		1,100
Ann thruput (gal): (enter value in Column A if not max PTE)		1.686E+07
RVP (psia):		2.1455
*API gravity =		25

Computed Values	
roof outage ¹ (feet):	0.3
vapor space volume ² (cubic feet):	901
turnovers ³ :	133.83
turnover factor ⁴ :	0.39
paint factor ⁵ :	0.68
surface temperatures (*R, *F)	
average ⁶ :	527.2 67.2
maximum ⁷ :	539 79
minimum ⁸ :	515.4 55.4
product factor ⁹ :	0.75
diurnal vapor ranges	
temperature ¹⁰ (fahrenheit degrees):	47.2
vapor pressure ¹¹ (psia):	0.576496
molecular weight ¹² (lb/lb-mol):	50
TVP ¹³ (psia) [adjusted for ave liquid surface temp]:	1.07212
vapor density ¹⁴ (lb/cubic foot):	0.009475
vapor expansion factor ¹⁵ :	0.127
vapor saturation factor ¹⁶ :	0.931212
vented vapor volume (scf/bbl):	8
fraction ROG - flashing losses:	0.308
fraction ROG - evaporative losses:	0.885

Adjusted TVP Matrix	
liquid	TVP value
gas rvp 13	7.908
gas rvp 10	5.56
gas rvp 7	3.932
crude oil	1.07212
JP-4	1.516
jet kerosene	0.0103
fuel oil 2	0.009488
fuel oil 6	0.0000472

RVP Matrix	
liquid	RVP value
gas rvp 13	13
gas rvp 10	10
gas rvp 7	7
crude oil	2.1455
JP-4	2.7
jet kerosene	0.029
fuel oil 2	0.022
fuel oil 6	0.00019

Long-Term
 VRU_Eff = 95.00%

Short-Term
 VRU_Eff = 95.00%

Emissions	Uncontrolled ROC emissions			Controlled ROC emissions		
	lb/hr	lb/day	ton/year	lb/hr	lb/day	ton/year
breathing loss ¹⁷ =	0.04	0.89	0.16	0.00	0.04	0.01
working loss ¹⁸ =	0.00	0.00	0.00	0.00	0.00	0.00
flashing loss ¹⁹ =	0.00	0.00	0.00	0.00	0.00	0.00
TOTALS =	0.04	0.89	0.16	0.00	0.04	0.01

FIXED ROOF TANK CALCULATION (AP-42: Chapter 7 Method)

Basic Input Data	
liquid (1:G13, 2:G10, 3:G7, 4:C, 5:JP, 6:ker, 7:O2, 8:O6) =	4
liquid TVP =	3.2
if TVP is entered, enter TVP temperature (*F) =	120
tank heated (yes, no) =	no
if tank is heated, enter temp (*F) =	
vapor recovery system present? (yes, no) =	yes
is this a wash tank? (yes, no) =	yes
will flashing losses occur in this tank? (yes, no) =	no
breather vent pressure setting range (psi) (def = 0.06):	0.06

Attachment: D Term
 Permit: ATC 12273
 Date: 07/11/07
 Tank: Wash Tank
 Name: Newlove Lease
 Filename: ..\xxxx.xls
 District: Santa Barbara
 Version: Tank-2b.xls

Tank Data	
diameter (feet) =	29.7
capacity (enter barrels in first col, gals will compute) =	3,000 126,000
conical or dome roof? (c, d) =	c
shell height (feet) =	24
roof height (def = 1):	1
ave liq height (feet):	23
color (1:Spec Al, 2:Diff Al, 3:Lite, 4:Med, 5:Rd, 6:Wh) =	4
condition (1: Good, 2: Poor) =	1
upstream pressure (psig) (def = 0 when no flashing occurs):	0

paint color	paint condition	
	good	poor
spec alum	0.39	0.49
diff alum	0.60	0.68
lite grey	0.54	0.63
med grey	0.68	0.74
red	0.89	0.91
white	0.17	0.34

Molecular Weight Matrix	
liquid	mol.wt.
gas rvp 13	62
gas rvp 10	66
gas rvp 7	68
crude oil	50
JP-4	80
jet kerosene	130
fuel oil 2	130
fuel oil 6	190

Liquid Data		
	A	B
maximum daily throughput (bopd) =		1,100
Ann thrupt (gal): (enter value in Column A if not max PTE)		1.686E+07
RVP (psia):		2.1455
*API gravity =		25

Computed Values	
roof outage ¹ (feet):	0.3
vapor space volume ² (cubic feet):	901
turnovers ³ :	133.83
turnover factor ⁴ :	0.39
paint factor ⁵ :	0.68
surface temperatures (*R, *F)	
average ⁶ :	527.2 67.2
maximum ⁷ :	539 79
minimum ⁸ :	515.4 55.4
product factor ⁹ :	0.75
diurnal vapor ranges	
temperature ¹⁰ (fahrenheit degrees):	47.2
vapor pressure ¹¹ (psia):	0.576496
molecular weight ¹² (lb/lb-mol):	50
TVP ¹³ (psia) [adjusted for ave liquid surface temp]:	1.07212
vapor density ¹⁴ (lb/cubic foot):	0.009475
vapor expansion factor ¹⁵ :	0.127
vapor saturation factor ¹⁶ :	0.931212
vented vapor volume (scf/bbl):	8
fraction ROG - flashing losses:	0.308
fraction ROG - evaporative losses:	0.885

Adjusted TVP Matrix	
liquid	TVP value
gas rvp 13	7.908
gas rvp 10	5.56
gas rvp 7	3.932
crude oil	1.07212
JP-4	1.516
jet kerosene	0.0103
fuel oil 2	0.009488
fuel oil 6	4.72E-05

RVP Matrix	
liquid	RVP value
gas rvp 13	13
gas rvp 10	10
gas rvp 7	7
crude oil	2.145500259
JP-4	2.7
jet kerosene	0.029
fuel oil 2	0.022
fuel oil 6	0.00019

Long-Term
 VRU_Eff = 95.00%

Short-Term
 VRU_Eff = 95.00%

Emissions	Uncontrolled ROG emission:			Controlled ROG emissions:		
	lb/hr	lb/day	ton/year	lb/hr	lb/day	ton/year
breathing loss ¹⁷ =	0.04	0.89	0.16	0.00	0.04	0.01
working loss ¹⁸ =	0.00	0.00	0.00	0.00	0.00	0.00
flashing loss ¹⁹ =	0.00	0.00	0.00	0.00	0.00	0.00
TOTALS =	0.04	0.89	0.16	0.00	0.04	0.01

ATTACHMENT B

Facility & Stationary Source NEI

Facility Emissions Summary
Newlove Lease FID 3321

I. This Projects "I" NEI-90

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr										
P12273				0.04	0.01								

II. This Facility's "P1s"

Enter all facility "P1" NEI-90s below:

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
P11909	5/23/2006			1.50	0.27								
A12084 ₁	6/5/2007	16.50	3.01	25.35	3.21	28.50	5.20	5.55	1.01	9.00	1.64	9.00	1.64
A12084 ₂	6/5/2007	33.00	6.02	26.71	4.23	57.00	10.40	11.11	2.03	18.00	3.29	18.00	3.29
P12144	8/31/2007			0.00	0.00								
P12354	1/10/2008			0.23	0.04								
Totals		49.50	9.03	53.79	7.75	85.50	15.60	16.66	3.04	27.00	4.93	27.00	4.93

Notes:
 (1) Facility NEI from IDS.
 (2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding.
 (3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.
 (4) ATC 12084 shows Phase 1 and Phase 2 NEI separately

III. This Facility's "P2" NEI-90 Decreases

Enter all facility "P2" NEI-90s below:

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr										
Totals		0.00											

Notes:
 (1) Facility NEI from IDS.
 (2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding.
 (3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.

IV. This Facility's Pre-90 "D" Decreases

Enter all facility "D" decreases below:

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr										
P11909	5/23/2006			1.50	0.27								
P12354	1/10/2008			0.23	0.04								
P12273				0.04	0.01								
Totals		0.00	0.00	1.77	0.32	0.00							

Notes:
 (1) Facility "D" from IDS.
 (2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding.
 (3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.

V. Calculated This Facility's NEI-90

Table below summarizes facility NEI-90 as equal to: I+ (P1-P2) -D

Term	NOx		ROC		CO		SOx		PM		PM10	
	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
Project "I"	0.00	0.00	0.04	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P1	49.50	9.03	53.79	7.75	85.50	15.60	16.66	3.04	27.00	4.93	27.00	4.93
P2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
D	0.00	0.00	1.77	0.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FNEI-90	49.50	9.03	52.06	7.44	85.50	15.60	16.66	3.04	27.00	4.93	27.00	4.93

Notes:
 (1) Resultant FNEI-90 from above Section I thru IV data.
 (2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding.
 (3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.

Calculated This Facility's NEI-90 (adjusted) ¹

Table below summarizes facility NEI-90 adjusted to only show ATC 12084 Phase 1 NEI contribution

FNEI-90 (adjusted)	16.50	3.01	25.35	3.21	28.50	5.20	5.55	1.01	9.00	1.64	9.00	1.64
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Notes:
 (1) Table shown is without Phase 2 ATC 12084 NEI contribution

Stationary Source NEI-90 Calculations
BreitBurn Energy Company LP Orcutt Hill Stationary Source

Facility FNEI-90 at this SSN

Enter all other facility NEI-90s below:

Facility No.	Date Revised	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
3206		0.00	0.00	1.78	0.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3313		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3314		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3316		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3318		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3319		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3320		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3321		49.50	9.03	52.06	7.44	85.50	15.60	16.66	3.04	27.00	4.93	27.00	4.93
3322		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3323		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3324		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3495		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4104		0.00	0.00	0.55	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4214		11.04	0.23	0.60	0.01	9.27	0.19	0.58	0.01	0.06	0.01	0.06	0.01
10482		6.05	1.09	4.26	0.77	10.49	1.91	2.04	0.37	3.31	0.60	3.31	0.60
1904		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Totals		66.59	10.35	59.25	8.65	105.26	17.70	19.28	3.42	30.37	5.54	30.37	5.54

Notes:
(1) Facility NEI from IDS.
(2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding.
(3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.

Calculate This SSN's NEI-90

Table below summarizes Stationary Source NEI-90 as equal to sum of each facility's (unless footnoted by an enforceable NEI scenario)

Term	NOx		ROC		CO		SOx		PM		PM10	
	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
SSN NEI-90	66.59	10.35	59.25	8.65	105.26	17.70	19.28	3.42	30.37	5.54	30.37	5.54

Notes:
(1) Resultant SSN NEI-90 from above Section I thru IV data.
(2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding.
(3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.
(4) Includes Phase 1 and 2 NEI under ATC 12084.

Table below summarizes Stationary Source NEI-90 (**adjusted**)

Term	NOx		ROC		CO		SOx		PM		PM10	
	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
SSN NEI-90	33.59	4.33	32.54	4.42	48.26	7.30	8.17	1.39	12.37	2.25	12.37	2.25

Notes:
(1) This Stationary Source NEI (adjusted) is applicable to all stationary source offset determinations until such time Phase 2 construction begins under ATC 12084. See NEI discussion in Engineering Evaluation in PTO 12273 for more details.

ATTACHMENT C

Fee Statement

FEE STATEMENT

PTO No. 12273

FID: 03321 Newlove Lease / SSID: 02667



Device Fee

Device No.	Device Name	Fee Schedule	Qty of Fee Units	Fee per Unit	Fee Units	Max or Min. Fee Apply?	Number of Same Devices	Pro Rate Factor	Device Fee	Penalty Fee?	Fee Credit	Total Fee per Device
109949	Wash Tank	A6	126.000	3.26	Per 1000 gallons	No	1	1.000	410.76	0.00	0.00	410.76
Device Fee Sub-Totals =									\$410.76	\$0.00	\$0.00	
Device Fee Total =												\$410.76

Permit Fee

Fee Based on Devices

410.76

Fee Statement Grand Total = \$410

Notes:

-
- (1) Fee Schedule Items are listed in APCD Rule 210, Fee Schedule "A".
 - (2) The term "Units" refers to the unit of measure defined in the Fee Schedule.

ATTACHMENT D

IDS Tables

IDS Database Emission Tables

Table 1
Permitted Potential to Emit (PPTE)

	NO _x	ROC	CO	SO _x	TSP	PM ₁₀
<i>PTO 12273 – Newlove Lease</i>						
lb/day		0.0				
tons/year		0.0				

Table 2
Facility Potential to Emit (FPTE)

	NO _x	ROC	CO	SO _x	TSP	PM ₁₀
<i>PTO 8240 – Newlove Lease</i>						
lb/day	49.50	131.95	85.50	16.66	27.00	27.00
tons/year	9.03	22.02	15.60	3.04	4.93	4.93

Table 3
Federal PT-70 Facility Potential to Emit (PT 70 FPTE)

	NO _x	ROC	CO	SO _x	TSP	PM ₁₀
<i>PTO 8240 – Newlove Lease</i>						
lb/day	49.50	83.91	85.50	16.66	27.00	27.00
tons/year	9.03	13.26	15.60	3.04	4.93	4.93

Table 4
Facility Net Emission Increase Since 1990 (FNEI-90)

	NO _x	ROC	CO	SO _x	TSP	PM ₁₀
<i>PTO 8240 – Newlove Lease</i>						
lbs/day	49.50	52.06	85.50	16.66	27.00	27.00
tons/year	9.03	7.44	15.60	3.04	4.93	4.93

Table 5
Facility Exempt Emissions (FXMT)

	NO _x	ROC	CO	SO _x	TSP	PM ₁₀
<i>PTO 8240 – Newlove Lease</i>						
lbs/day	0.00	0.84	0.00	0.00	0.00	0.00
tons/year	0.00	0.15	0.00	0.00	0.00	0.00