



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



MAY 08 2012

Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

Re: **Proposed Authority to Construct / Certificate of Conformity (Minor Mod)**
District Facility # S-1737
Project # S-1120604

Dear Mr. Rios:

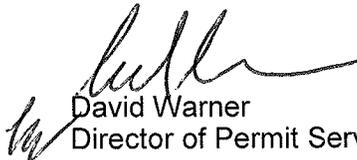
Enclosed for your review is the District's engineering evaluation of an application for Authority to Construct for Vintage Production California, LLC, located at the Light Oil Central stationary source, which has been issued a Title V permit. Vintage Production California, LLC is requesting that a Certificate of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. Vintage is proposing to install four portable crude oil tanks authorized to operate at various unspecified locations within the Light Oil Central stationary source. The new tanks (S-1737-181-0, '-182-0, '-183-0, and '-184-0) will be connected the vapor control system listed on tanks S-1737-157-1, '-168-3, '-172-1 or flares '-167-4, and '-180-1.

Enclosed is the engineering evaluation of this application, a copy of the current Title V permit, and proposed Authority to Construct # S-1737-157-2, '-167-4, '-168-3, '-172-1, '-180-1, '-181-0, '-182-0, '-183-0, and '-184-0 with Certificate of Conformity. After demonstrating compliance with the Authority to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter. 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: Steve Davidson, Permit Services

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
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MAY 08 2012

Joey Barulich
Vintage Production California, LLC
9600 Ming Avenue
Bakersfield, CA 93311

**Re: Proposed Authority to Construct / Certificate of Conformity (Minor Mod)
District Facility # S-1737
Project # S-1120604**

Dear Mr. Barulich:

Enclosed for your review is the District's analysis of your application for Authority to Construct for the facility identified above. You have requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. Vintage is proposing to install four portable crude oil tanks authorized to operate at various unspecified locations within the Light Oil Central stationary source. The new tanks (S-1737-181-0, '-182-0, '-183-0, and '-184-0) will be connected the vapor control system listed on tanks S-1737-157-1, '-168-3, '-172-1 or flares '-167-4, and '-180-1.

After addressing any EPA comments made during the 45-day comment period, the Authority to Construct will be issued to the facility with a Certificate of Conformity. Prior to operating with modifications authorized by the Authority 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: Steve Davidson, Permit Services

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Authority to Construct Application Review

Fixed Roof Oil Field Production Tank < 5000 BBLs
Heavy Oil, Connected to Vapor Control,
Not subject to NSPS

Facility Name: Vintage Production California
Mailing Address: 9600 Ming Avenue, Suite 3000
Bakersfield, CA, 93311
Contact Person: Joey Barulich
Telephone: (661) 869-8075
e-mail Joey_Barulich@oxy.com
Application #(s): S-1737-157-2, '-167-4, '-168-3, '-172-1, '-180-1, '-181-0, '-182-0, '-183-0, and '-184-0
Project #: S-1120604
Deemed Complete: March 19, 2012

Date: April 4, 2012
Engineer: Steve Davidson
Lead Engineer: Dan Klevann
DK 4-26-12

I. Proposal

Vintage Production California is applying for Authorities to Construct (ATC) to install four portable crude oil tanks authorized to operate at various unspecified locations within Vintage's Light Oil Central stationary source. The new tanks (S-1737-181-0, '-182-0, '-183-0, and '-184-0) will be connected the vapor control system listed on tanks S-1737-157-1, '-168-2, '-172-0 or various unspecified location flares '-167-4, and '-180-1. The current permits for the existing tank and flares are included in Attachment A.

Vintage has a Title V Permit. This modification can be classified as a Title V minor modification pursuant to Rule 2520, Section 3.20, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. Vintage must apply to administratively amend their Title V Operating Permit to include the requirements of the ATC(s) issued with this project.

Disposition of Outstanding ATCs:

ATC S-1737-168-2, and '-172-1 will serves as base document. (see Attachment A).

II. Applicable Rules

Rule 2201 New and Modified Stationary Source Review Rule (4/21/11)
Rule 2520 Federally Mandated Operating Permits (6/21/01)

- Rule 4001 New Source Performance Standards, subpart Kb (Amended 4/14/99). Not applicable. This subpart does not apply to vessels with a design capacity $\leq 1,589.874 \text{ m}^3$ ($\leq 420,000$ gallons) used for petroleum or condensate stored, processed, or treated prior to custody transfer. The capacity of these tanks is $\leq 420,000$ gallons, and they store crude oil prior to custody transfer; therefore, this subpart does not apply to the tanks in this project.
- Rule 4101 Visible Emissions (02/17/05)
- Rule 4102 Nuisance (12/17/92)
- Rule 4201 Particulate Matter Concentration (12/17/92)
- Rule 4301 Fuel Burning Equipment (12/17/92) – N/A see compliance section
- Rule 4307 Boilers, Steam Generators, and Process Heaters – 2.0 MMBtu/hr to 5.0 MMBtu/hr (5/19/11)
- Rule 4311 Flares (6/18/09)
- Rule 4409 Components at light crude Oil Production Facilities, Natural Gas Production Facilities, and Natural Gas Processing Facilities (4/20/05) - not applicable as the API gravity of oil is less than 30 degrees
- Rule 4623 Storage of Organic Liquids (05/19/05)
- Rule 4801 Sulfur Compounds (12/17/92)
- 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 equipment will be located at various unspecified locations within Vintage's Light Oil Central stationary source. The equipment is not located within 1,000 feet of the outer boundary of any K-12 school. Therefore, pursuant to CH&SC 42301.6, California Health and Safety Code (School Notice), public notification is not required.

IV. Process Description

VOC emissions from the tanks will be controlled to by a shared vapor control system in accordance with PTOs '-157-1, '-168-3, '-172-1 or directly by flares '-167-4, and '-180-1. The vapor control system collects vapors from the tanks and routes the uncondensed vapors to a VOC control device that reduces inlet VOC emissions by at least 95% by weight.

Equipment Listing

Pre-Project Equipment Description:

- PTO S-1737-157-1: 63,000 GALLON (1,500 BBL) FIXED ROOF WASH TANK (T-01) WITH VAPOR CONTROL SHARED WITH S-1737-158, '-159, '-160, AND '-161 VENTING TO GAS SALES LINE, 41.7 MMBTU/HR COANDA TIP FLARE, AND/OR 2.0 MMBTU/HR PRODUCTION HEATER (S-1737-160)
- PTO S-1737-167-3: 14.6 MMBTU/HR PRODUCED GAS FLARE WITH COANDA EFFECT TIP AND PILOT AUTHORIZED TO BE USED AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE LIGHT OIL CENTRAL STATIONARY SOURCE
- ATC S-1737-168-2: 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 1.8 MMSCFD AIR-ASSISTED FLARE OR GAS SALES PIPELINE: DESIGNATE FLARE SEPARATELY AS PERMIT UNIT S-1737-180-0
- PTO S-1737-172-0: 300 BBL CRUDE OIL WASH TANK WITH VAPOR CONTROL SYSTEM INCLUDING COMPRESSOR, SERVED BY FLARE AND HYDROGEN SULFIDE SCAVENGER SYSTEM LISTED ON S-1737-178, SHARED WITH S-1737-173, -174, -175, & -176 (SEMITROPIC TANK BATTERY)
- ATC S-1737-180-0: 9 MMBTU/HR FLARE APPROVED FOR USE IN WELL TESTING, TANK AND WELL VENT CONTROL, EQUIPMENT SHUTDOWN, EMERGENCIES AND OTHER SITUATIONS REQUIRING A SAFETY FLARE AT VARIOUS UNSPECIFIED LOCATIONS

Proposed Modification:

- ATC S-1737-157-2: MODIFICATION OF 63,000 GALLON (1,500 BBL) FIXED ROOF WASH TANK (T-01) WITH VAPOR CONTROL SHARED WITH S-1737-158, '-159, '-160, AND/OR '-161

VENTING TO GAS SALES LINE, 41.7 MMBTU/HR COANDA TIP FLARE, AND/OR 2.0 MMBTU/HR PRODUCTION HEATER (S-1737-160): ALLOW OPTION OF CONNECTING PORTABLE TANKS S-1737-181, '-182, '-183, AND/OR '-184 TO THE VAPOR CONTROL SYSTEM

ATC S-1737-167-4: MODIFICATION OF 14.6 MMBTU/HR PRODUCED GAS FLARE WITH COANDA EFFECT TIP AND PILOT AUTHORIZED TO BE USED AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE LIGHT OIL CENTRAL STATIONARY SOURCE: AUTHORIZE COMBUSTION OF VAPORS FROM TANKS S-1737-181, '-182, '-183 AND/OR '-184

ATC S-1737-168-3: 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 FLARE S-1737-180-0 AND/OR SALES GAS LINE: ALLOW OPTION OF CONNECTING PORTABLE TANKS S-1737-181, '-182, '-183, AND/OR '-184 TO THE VAPOR CONTROL SYSTEM

ATC S-1737-172-1: MODIFICATION OF 300 BBL CRUDE OIL WASH TANK WITH VAPOR CONTROL SYSTEM INCLUDING COMPRESSOR, SERVED BY FLARE AND HYDROGEN SULFIDE SCAVENGER SYSTEM LISTED ON S-1737-178, SHARED WITH S-1737-173, -174, -175, & -176 (SEMITROPIC TANK BATTERY): ALLOW OPTION OF CONNECTING PORTABLE TANKS S-1737-181, '-182, '-183, AND/OR '-184 TO THE VAPOR CONTROL SYSTEM

ATC S-1737-180-1: MODIFICATION OF 49 MMBTU/HR FLARE APPROVED FOR USE IN WELL TESTING, TANK AND WELL VENT CONTROL, EQUIPMENT SHUTDOWN, EMERGENCIES AND OTHER SITUATIONS REQUIRING A SAFETY FLARE AT VARIOUS UNSPECIFIED LOCATIONS: AUTHORIZE COMBUSTION OF VAPORS FROM TANKS S-1737-181, '-182, '-183 AND/OR '-184

ATC S-1737-181-0: 500 BBL PORTABLE CRUDE OIL TANK AUTHORIZED TO OPERATE AT VARIOUS UNSPECIFIED LOCATIONS AND

CONNECT TO VAPOR CONTROL SYSTEMS LISTED ON PERMIT S-1737-157, '-168, '-172, OR FLARES S-1737-167 OR '180

ATC S-1737-182-0: 500 BBL PORTABLE CRUDE OIL TANK AUTHORIZED TO OPERATE AT VARIOUS UNSPECIFIED LOCATIONS AND CONNECT TO VAPOR CONTROL SYSTEMS LISTED ON PERMIT S-1737-157, '-168, '-172, OR FLARES S-1737-167 OR '180

ATC S-1737-183-0: 500 BBL PORTABLE CRUDE OIL TANK AUTHORIZED TO OPERATE AT VARIOUS UNSPECIFIED LOCATIONS AND CONNECT TO VAPOR CONTROL SYSTEMS LISTED ON PERMIT S-1737-157, '-168, '-172, OR FLARES S-1737-167 OR '180

ATC S-1737-184-0: 500 BBL PORTABLE CRUDE OIL TANK AUTHORIZED TO OPERATE AT VARIOUS UNSPECIFIED LOCATIONS AND CONNECT TO VAPOR CONTROL SYSTEMS LISTED ON PERMIT S-1737-157, '-168, '-172, OR FLARES S-1737-167 OR '180

Post Project equipment Description:

PTO S-1737-157-2: 1,500 BBL FIXED ROOF WASH TANK (T-01) WITH VAPOR CONTROL SHARED WITH S-1737-158, '-159, '-160, '-161, AND OPTIONAL PORTABLE TANKS S-1737-181, '-182, '-183, AND/OR '-184 VENTING TO GAS SALES LINE, 41.7 MMBTU/HR COANDA TIP FLARE, AND/OR 2.0 MMBTU/HR PRODUCTION HEATER (S-1737-160)

PTO S-1737-167-4: 14.6 MMBTU/HR PRODUCED GAS FLARE WITH COANDA EFFECT TIP AND PILOT AUTHORIZED TO BE USED AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE LIGHT OIL CENTRAL STATIONARY SOURCE

PTO S-1737-168-3: 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, AND/OR '-183. VAPOR RECOVERY SYSTEM CONSISTS OF COMPRESSOR AND ASSOCIATED PIPING DISCHARGING TO FLARE S-1737-180-0 AND/OR SALES GAS LINE

- PTO S-1737-172-1: 300 BBL CRUDE OIL WASH TANK WITH VAPOR CONTROL SYSTEM INCLUDING COMPRESSOR, SERVED BY FLARE AND HYDROGEN SULFIDE SCAVENGER SYSTEM LISTED ON S-1737-178, SHARED WITH S-1737-173, -174, -175, & -176 (SEMITROPIC TANK BATTERY) AND OPTIONAL PORTABLE TANKS S-1737-181, '-182, AND/OR '-183
- PTO S-1737-180-1: 49 MMBTU/HR FLARE APPROVED FOR USE IN WELL TESTING, TANK AND WELL VENT CONTROL, EQUIPMENT SHUTDOWN, EMERGENCIES AND OTHER SITUATIONS REQUIRING A SAFETY FLARE AT VARIOUS UNSPECIFIED LOCATIONS
- PTO S-1737-181-0: 500 BBL PORTABLE CRUDE OIL TANK AUTHORIZED TO OPERATE AT VARIOUS UNSPECIFIED LOCATIONS AND CONNECT TO VAPOR CONTROL SYSTEMS LISTED ON PERMIT S-1737-157, '-168, '-172, OR FLARES S-1737-167 OR '180
- PTO S-1737-182-0: 500 BBL PORTABLE CRUDE OIL TANK AUTHORIZED TO OPERATE AT VARIOUS UNSPECIFIED LOCATIONS AND CONNECT TO VAPOR CONTROL SYSTEMS LISTED ON PERMIT S-1737-157, '-168, '-172, OR FLARES S-1737-167 OR '180
- PTO S-1737-183-0: 500 BBL PORTABLE CRUDE OIL TANK AUTHORIZED TO OPERATE AT VARIOUS UNSPECIFIED LOCATIONS AND CONNECT TO VAPOR CONTROL SYSTEMS LISTED ON PERMIT S-1737-157, '-168, '-172, OR FLARES S-1737-167 OR '180
- PTO S-1737-184-0: 500 BBL PORTABLE CRUDE OIL TANK AUTHORIZED TO OPERATE AT VARIOUS UNSPECIFIED LOCATIONS AND CONNECT TO VAPOR CONTROL SYSTEMS LISTED ON PERMIT S-1737-157, '-168, '-172, OR FLARES S-1737-167 OR '180

VI. Emission Control Technology Evaluation

The tank vapor control systems collect vapors from the tanks, remove entrained liquid in knockout vessels and scrubber vessels, condense gases in heat exchangers, and route the uncondensed vapors a control device for incineration or to a gas sales pipeline. The efficiency of the vapor control systems are at least 95%.

The subject flares have the potential to emit NO_x, SO_x, PM₁₀, CO, and VOC emissions due to the incineration of produced gas generated by oil production activities.

To ensure that combustible gases are incinerated, the flares' outlets are equipped with an automatic ignition system, or they operate with a pilot flame present at all times when gases are vented through the flare.

VII. Emissions Calculations

Per FYI-111, ATC, Title V, and NSR applicability determinations, the modification of a tank vapor control system by connecting a new tank to the system or allowing an existing control device, currently allowed to burn waste gas, to burn waste gas from a different source are not changes in the method of operation and are not NSR modifications. Therefore, calculations are not required for existing tanks S-1737-157, '-168, '-172, and flares '-167, and '-180 .

The potential to emit from tanks S-1737-181-0, '-182-0, '-183-0, and '-184-0 will be calculated using California Implementation Guidelines for Estimating Mass Emissions of fugitive Hydrocarbon Leaks at Petroleum Facilities, CAPCOA/CARB, February 1999. Applicant is proposing use of the "revised screening" emission factors.

A. Assumptions

- Facility will operate 24 hours per day, 7 days per week, and 52 weeks per year.
- The fugitive emissions for all tanks are calculated using California Implementation Guidelines for Estimating Mass Emissions of fugitive Hydrocarbon Leaks at Petroleum Facilities, CAPCOA/CARB, February 1999 "revised screening" emissions factors.
- The percentage of VOCs of the total hydrocarbons is 100%
- Per FYI-111, modifying the tank vapor control system to connect a new tank to the system is not a NSR modification; therefore, tanks S-1737-157-1, '-168-3, '-172-1 are not being modified and do not require calculations.

B. Emission Factors

Pursuant to California Implementation Guidelines for Estimating Mass Emissions of fugitive Hydrocarbon Leaks at Petroleum Facilities, CAPCOA/CARB, February 1999, emissions in this project are calculated using the "revised screening" emissions factors (see Attachment B for a calculation spreadsheets showing the emission factors used and the resulting emissions).

C. Calculations

1. Pre-Project Potential to Emit, (PE₁)

Since tanks S-1737-181-0, '-182-0, '-183-0, and '-184 are new emissions units, the PE₁ = 0

2. Post Project Potential to Emit, (PE₂)

Post-project potential to emit is calculated based on the fugitive component counts. The following table summarizes the post-project potential to emit for units included in this project (see calculations in attachment B).

Permit Unit	VOC - Daily PE2 (lb/day)	VOC - Annual PE2 (lb/Year)
S-1737-181-0	0.2	73
S-1737-182-0	0.2	73
S-1737-183-0	0.2	73
S-1737-184-0	0.2	73

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

Pursuant to District Rule 2201, the 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 (AER) that have occurred at the source, and which have not been used on-site.

Applicant stipulates that the pre-project, facility-wide NO_x and VOC emissions exceed both the offset threshold for NO_x and VOC's and the Major Source threshold for NO_x and VOC's. Therefore, SSPE1 calculations for NO_x and VOC pollutants are not necessary.

The SSPE1 for SO_x, PM₁₀, and CO is calculated in Attachment C and presented in the following table.

SSPE1 (lb/year)			
	SO _x	PM ₁₀	CO
SSPE1	3701	13,663	201,089

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

Pursuant to District Rule 2201, the SSPE2 is the PE from all units with valid ATCs or PTOs at the Stationary Source and the quantity of ERCs which have been banked since September 19, 1991 for AER that have occurred at the source, and which have not been used on-site.

As noted above, the applicant stipulates that the pre-project, facility-wide NO_x and VOC emissions exceed both the offset threshold for NO_x and VOC's and the Major Source threshold for NO_x and VOC's. Therefore, SSPE2 calculations for NO_x and VOC pollutants are not necessary.

The SSPE2 can be calculated for SO_x, PM₁₀, and CO by adding the PE2 from all units with valid ATCs or PTOs and the sum of the ERCs that have been banked at the source and which have not been used on-site (Total_{ERC}).

$$SSPE2_{Total} = SSPE2_{Permit\ Unit} + Total_{ERC}$$

There is no change in the potential SO_x, PM₁₀, and CO emissions associated with this project. Therefore, for SO_x, PM₁₀, and CO the SSPE2 is equal to SSPE1 and presented in the following table.

SSPE2 (lb/year)			
	SO _x	PM ₁₀	CO
SSPE2	3701	13,663	201,089

5. 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. However, for the purposes of determining major source status, the SSPE2 shall not include the quantity of ERCs which have been banked since September 19, 1991 for AER that have occurred at the source, and which have not been used on-site."

This source is an existing Major Source for NO_x and VOC emissions and will remain a Major Source for NO_x and VOC. The Major Source determination SO_x, PM₁₀, and CO is calculated and shown below:

Major Source Determination (lb/year)			
	SO _x	PM ₁₀	CO
SSPE1	3701	13,663	201,089
SSPE2	3701	13,663	201,089

Major Source Threshold	140,000	140,000	200,000
Major Source?	No	No	Yes

As seen in the table above, the facility is not becoming a Major Source as a result of this project.

6. Baseline Emissions (BE)

a. Annual BE

The annual BE is performed pollutant by pollutant to determine the amount of offsets required, where necessary, when the SSPE1 is greater than the offset threshold. For this project the annual BE will be performed to calculate quarterly Baseline Emissions (QBE)

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 Section 3.23

Since these are new tanks, the BE is equal zero.

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, increases in fugitive emissions are not included in the SB 288 Major Modification calculation.

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 increases in fugitive emissions are not included in the Federal Major Modification determination.

9. 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 shall be calculated as follows:

QNEC = PE2 - BE, where:

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

Using the values in Sections VII.C.2 and VII.C.6 in the evaluation above, quarterly PE2 and quarterly BE can be calculated as follows:

Tanks S-1737-181-0, '-182-0, '-183-0, and '-184-0:

PE2_{quarterly} = PE2_{annual} ÷ 4 quarters/year
= 73 lb/year ÷ 4 qtr/year
= 18 lb PM₁₀/qtr

BE_{quarterly} = BE_{annual} ÷ 4 quarters/year
= 0 lb/year ÷ 4 qtr/year
= 0 lb PM₁₀/qtr

VIII. Compliance

Rule 2201 - New and Modified Stationary Source Review Rule

Per FYI-111, ATC, Title V, and NSR applicability determinations, the modification of a tank vapor control system by connecting a new tank to the system or allowing an existing control device, currently allowed to burn waste gas, to burn waste gas from a different source are not changes in the method of operation and are not NSR modifications. Therefore, allowing the new tanks to vent to the vapor control listed on existing tanks S-1737-157, '-168, '-172, and existing flares '-167, '-172, and '-180 are not modifications to the existing units and the existing units are not subject to this rule.

A. BACT

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis for the following*:

- 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, and/or
- c) Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day.
- d) When a Major Modification is triggered for a modification project at a facility that is a Major Source.

*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.

The applicant is proposing to install a four new tanks with each with a PE of 0.2 lb/day for VOC as calculated in section VII.C.2. Since the daily VOC emissions are less than 2.0 lbs/day, BACT will not be triggered.

B. Offsets

1. Offset Applicability

Offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the SSPE2 equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The SSPE2 is compared to the offset thresholds in the following table.

Offset Applicability			
Pollutant	SSPE2 (lb/yr)	Offset Threshold Levels (lb/yr)	Offsets Required?
VOC	>20,000	20,000	Yes

2. Quantity of Offsets Required

As shown above, each tank associated with this project has an increase in potential emissions of less than 0.5 lb/day. Per District Policy APR 1130, an IPE of less than or equal to 0.5 lb/day to be rounded to zero for the purposes of triggering NSR requirements; therefore, offsets 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 SSPE 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 and VII.C.8, 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 these new units are compared to the daily PE Public Notice thresholds in the following table:

PE > 100 lb/day Public Notice Thresholds				
Permit	Pollutant	PE2 (lb/day)	Public Notice Threshold	Public Notice Triggered?
S-1737-181-0	VOC	0.2	100 lb/day	No
S-1737-182-0	VOC	0.2	100 lb/day	No
S-1737-183-0	VOC	0.2	100 lb/day	No
S-1737-184-0	VOC	0.2	100 lb/day	No

Therefore, public noticing for PE > 100 purposes is not required

c. Offset Threshold

The following table compares the pre-project SSPE1 with the post-project SSPE2 in order to determine if any offset thresholds have been surpassed.

Offset Threshold				
Pollutant	SSPE1 (lb/yr)	SSPE2 (lb/yr)	Offset Levels (lb/yr)	Public Notice Required?
VOC	> 20,000	> 20,000	20,000	No

Since the SSPE2 does surpass the offset threshold levels, public noticing is not triggered for this project.

d) SSIPE > 20,000 lb/yr

The SSIPE (NEC) is calculated and shown as follows:

$$\text{SSIPE} = \sum \text{PE}_{2\text{project}} - \text{PE}_{1\text{project}}$$

Stationary Source Increase in Permitted Emissions (SSIPE)			
Pollutant	PE _{2project} (lb/yr)	PE _{project} (lb/yr)	SSIPE (lb/yr)
VOC	292	0	292

As shown in the above table, the SSIPE for this project does not exceed the 20,000 lb/yr public notice threshold.

Therefore, public noticing is not required for SSIPE purposes.

2. Public Notice Action

This project will not result in emissions, for any criteria pollutant, which would subject these emission units to any of the noticing requirements listed above. Therefore, public notice will not be required for this project.

D. Daily Emissions Limits (DEL)

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.

DELs for the new tanks in this project will be included on the ATCs in the form of fugitive component emissions limits in lb VOC/day. The permittee will be

required to maintain accurate records of fugitive component counts and resulting emission calculations to validate the DEL.

E. Compliance Assurance

The following measures shall be taken to ensure continued compliance with District Rules:

1. Source Testing

Pursuant to District Policy APR 1705, source testing is not required to demonstrate compliance with Rule 2201.

2. Monitoring

Fugitive emissions monitoring is required. The following permit conditions will appear on the tank permits to ensure continued compliance:

- 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 Rules 2201 and 4623]
- 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]
- 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]
- 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]

- 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]
- 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]
- Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rules 2201 and 4623]

3. Record Keeping

Recordkeeping is required to demonstrate compliance with the offset, public notification and daily emission limit requirements of Rule 2201. The following conditions will appear on the permits:

- The permittee shall keep accurate records of the dates of inspection and monitoring and the components inspected and monitored. [District Rule 2201]
- {2490} All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] N

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 pursuant to Section 3.20 of this rule. 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.

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 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 bbls, used for petroleum or condensate, that is stored, processed, and/or treated at a drilling and production facility prior to custody transfer.

Therefore, the requirements of this subpart are not applicable to this project.

Rule 4101 - Visible Emissions

Rule 4101 states that no air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity.

As long as the equipment is properly maintained and operated, compliance with visible emissions limits is expected under normal operating conditions. However, the following conditions will remain on the flare permits to ensure continued compliance:

- Flare shall operate in a smokeless manner (no greater than 5% opacity) except for three minutes in any one hour. [District Rule 2201] Y
- A trained observer, as defined in EPA Method 22, shall check visible emissions at least once every two weeks for a period of 15 minutes. If visible emissions are detected at any time during this period, the observation period shall be extended to two hours. A record containing the results of these observations shall be maintained, which also includes company name, process unit, observer's name and affiliation, date, estimated wind speed and direction, sky condition, and the observer's location relative to the source and sun. [District Rules 2080 and 4101]

Rule 4102 - Public 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.

CH&SC 41700 - California Health and Safety Code

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 (**Appendix D**), 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-1737-181-0	1.54 E-08	No
S-1737-182-0	1.78 E-08	No
S-1737-183-0	1.85 E-08	No
S-1737-184-0	1.58 E-08	No

Discussion of T-BACT

BACT for toxic emission control (T-BACT) is required if the cancer risk exceeds one in one million. As demonstrated above, T-BACT is not required for this project because the HRA indicates that the risk is not above the District's thresholds for triggering T-BACT requirements; therefore, compliance with the District's Risk Management Policy is expected.

District policy APR 1905 also specifies that the increase in emissions associated with a proposed new source or modification not have acute or chronic indices, or a cancer risk greater than the District's significance levels (i.e. acute and/or chronic indices greater than 1 and a cancer risk greater than 10 in a million). As outlined by the HRA Summary in Appendix D of this report, the emissions increases for this project was determined to be less than significant.

Rule 4201, Particulate Matter Concentration

The purpose of this rule is to protect the ambient air quality by establishing a particulate matter emission standard. This rule applies to any source operation which emits or may emit dust, fumes, or total suspended particulate matter. This rule requires that a person shall not release or discharge into the atmosphere from any single source operation, dust, fumes, or total suspended particulate matter emissions in excess of 0.1 grain per cubic foot of gas at dry standard conditions. The flares are currently in compliance with this Rule and continued compliance is expected.

Rule 4301, Fuel Burning Equipment

The purpose of this rule is to limit the emission of air contaminants from fuel burning equipment. This rule limits the concentration of combustion contaminants and specifies maximum emission rates for sulfur dioxide, nitrogen oxide and combustion contaminant emissions. The provisions of this rule apply to any fuel burning equipment except air pollution control equipment which is exempted according to Section 4.0.

The flares are not fuel burning equipment pursuant to Rule 4301, Section 3.1 definition. Therefore, the requirements of this rule are not applicable. Furthermore this flare is serving primarily as air pollution control equipment by using a combustion process to destroy air contaminants shall be exempt from the provisions of this rule per section 4.1

Rule 4307, Boilers, Steam Generators, and Process Heaters – 2.0 MMBtu/hr to 5.0 MMBtu/hr

The purpose of this rule is to limit emissions of oxides of nitrogen (NO_x), carbon monoxide (CO), oxides of sulfur (SO₂), and particulate matter 10 microns or less (PM₁₀) from boilers, steam generators, and process heaters.

Permit S-1737-168 has two heater treaters with one burner each rated less than 5 MMbtu/hour. The heater treaters are tuned twice a year for compliance with this Rule. Continued compliance is expected.

Rule 4311, Flares

The purpose of this rule is to limit the emissions of volatile organic compounds (VOC), oxides of nitrogen (NO_x), and sulfur oxides (SO_x) from the operation of flares.

Sections 5.1 through Section 5.11 specify requirements for flares that are subject to the rule. To ensure compliance with the applicable provisions of the rule, the following conditions will be included in the proposed ATCs:

- The flame shall be present at all times when combustible gases are vented through the flare. [District Rule 4311]
- The outlet shall be equipped with an automatic ignition system, or shall operate with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rules 2201 and 4311]
- Except for flares equipped with a flow-sensing ignition system, a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present, shall be installed and operated. [District Rule 4311]
- Flares that use flow-sensing automatic ignition systems and which do not use a continuous flame pilot shall use purge gas for purging. [District Rule 4311]

Section 5.8 Flame Minimization Plan: Effective after July 1, 2011, flaring is prohibited unless it is consistent with an approved Flame Minimization Plan. Section 5.10 states that after July 1, 2011, the operator subject to flare minimization requirements shall monitor the vent gas flow to the flare with a flow measuring device or other parameters as specified in the Permit to Operate. The operator shall maintain records pursuant to Section 6.1.7 of this rule. Flares that the operator can verify, based on permit conditions, are not capable of producing reportable flare events pursuant to Section 6.2.2 shall not be required to monitor vent gas flow to the flare.

The applicant has an approved Flare Minimization Plan and is in compliance with this section of the rule.

Rule 4623, *Storage of Organic Liquids*

This rule applies to any tank with a capacity of 1,100 gallons or greater in which any organic liquid is placed, held, or stored.

The affected tanks are served by a vapor control system that has a control efficiency of at least 95%. This rule also requires the tank and tank vapor control system to be maintained in a leak-free condition. Leak-free is defined in the rule as no readings on a portable VOC detection device greater than 10,000 ppmv above background and no dripping of organic liquid at a rate of more than 3 drops per minute.

Tank(s) S-1737-157, '-168, '-172, '-181, '-182, '-183, and '-184 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.

Rule 4801 Sulfur Compounds (December 17, 1992)

The purpose of this rule is to limit the emissions of sulfur compounds and shall apply to any discharge to the atmosphere of sulfur compounds, which would exist as a liquid or a gas at standard conditions. Current emissions of sulfur compounds as SO₂ do not exceed 0.2% by volume. Continued compliance is expected

CH&SC 42301.6 California Health & Safety Code (School Notice)

The applicant has stated that this equipment will not be 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)

The California Environmental Quality Act (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 San Joaquin Valley Unified Air Pollution Control District (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.
- 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 tanks are equipped with a vapor control system that satisfies the Best Performance Standards (BPS) for Front-line Organic Liquid Storage Tanks, Fixed Roof Tanks < 5,000 bbl. The District therefore concludes that the project would have a less than cumulatively significant impact on global climate change and no other discussion for green house gas emissions is required.

District CEQA Findings

The District is the Lead Agency for this project because there is no other agency with broader statutory authority over this project. The District performed an Engineering Evaluation (this document) for the proposed project and determined that the activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. The District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15031 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

IX. Recommendations

Compliance with all applicable rules and regulations is expected. Pending a successful EPA noticing period, issue Authorities to Construct S-1737-157-2, '-167-4, '-168-3, '-172-1, '-180-1, '-181-0, '-182-0, '-183-0, and '-184-0 subject to the permit conditions on the attached draft Authority to Construct in Attachment F.

X. Billing Information

Permit Number	Fee Schedule	Fee Description	Annual Fee
S-1737-157-2	3020-5-D	1500 BBL	\$185.00
S-1737-167-4	3020-2-G	14.6 MMBtu	\$815.00
S-1737-168-3	3020-2-H	85.5 MMBtu	\$1030.00
S-1737-172-1	3020-5-B	300 BBL	\$93.00
S-1737-180-1	3020-2-H	49 MMBtu	\$1030.00
S-1737-181-0	3020-5-C	500 BBL	\$135.00
S-1737-182-0	3020-5-C	500 BBL	\$135.00
S-1737-183-0	3020-5-C	500 BBL	\$135.00
S-1737-184-0	3020-5-C	500 BBL	\$135.00

- ATTACHMENT: A Current PTO(s)
- ATTACHMENT: B Emissions Calculations
- ATTACHMENT: C SSIPE Calculations
- ATTACHMENT: D Health Risk Assessment
- ATTACHMENT: E Certificate of Conformity
- ATTACHMENT: F Draft ATC(s)

Offset Threshold				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO _x	>20,000 lb/year	>20,000 lb/year	20,000 lb/year	No
SO _x	>54,750 lb/year	>54,750 lb/year	54,750 lb/year	No
PM ₁₀	>29,200 lb/year	>29,200 lb/year	29,200 lb/year	No
CO	>200,000 lb/year	>200,000 lb/year	200,000 lb/year	No
VOC	>20,000 lb/year	>20,000 lb/year	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 Stationary Source Increase in Permitted Emissions (SSIPE) of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE is calculated as the Post Project Stationary Source Potential to Emit (SSPE2) minus the Pre-Project Stationary Source Potential to Emit (SSPE1), i.e. $SSIPE = SSPE2 - SSPE1$. The values for SSPE2 and SSPE1 are calculated according to Rule 2201, Sections 4.9 and 4.10, respectively. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table:

Stationary Source Increase in Permitted Emissions [SSIPE] – Public Notice					
Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
NO _x	>20,000 lb/year	>20,000 lb/year	0	20,000 lb/year	No
SO _x	>54,750 lb/year	>54,750 lb/year	0	20,000 lb/year	No
PM ₁₀	>29,200 lb/year	>29,200 lb/year	0	20,000 lb/year	No
CO	>200,000 lb/year	>200,000 lb/year	0	20,000 lb/year	No
VOC	>20,000 lb/year	>20,000 lb/year	0	20,000 lb/year	No

As demonstrated above, 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, this project will result in a SB288 Major Modification. Therefore, public notice is required for this project.

D. Daily Emission Limits (DELs)

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Section 3.15 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.15.1 and 3.15.2, 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.

Current and Proposed Rule 2201 (DEL) Conditions:

The NOx emissions limit has been lowered from 15 ppmv @ 3% O2 (0.018 lb/MMBtu) to 14 ppmv @ 3% O2 (0.017 lb/MMBtu).

The following condition is deleted (strikeout text) and replaced by the underlined condition:

'-36 through '-42

~~'-36 th9. Whenever well casing vapors and/or tank vapor recovery gas are being burned in this unit, the SO2 scrubber shall operate and shall reduce SO2 emissions by 95% by weight, or shall limit exhaust SO2 to less than or equal to 9 ppmv corrected to 3.0% oxygen. [District Rules 2201 and 4320] N~~

Fuel gas sulfur content shall not exceed 1 gr S/100 scf unless SOx is reduced by 95% or to 9 ppmv SOx @ 3% O2 in exhaust with scrubber. [District Rule 2201]

'-42, '-43, '-45 (underlined condition added to existing condition (in normal type)

Fuel gas shall not contain more than 5 grains of total sulfur per 100 standard cubic feet. [District Rule 4320] Y

Fuel gas sulfur content shall not exceed 1 gr S/100 scf unless SOx is reduced by 95% or to 9 ppmv SOx @ 3% O2 in exhaust with scrubber. [District Rule 2201] Y

E. Compliance Assurance

1. Source Testing

This unit is subject to District Rule 4305, *Boilers, Steam Generators and Process Heaters, Phase 2*, District Rule 4306, *Boilers, Steam Generators and Process Heaters, Phase 3*, and District Rule 4320 *Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr*. Source testing requirements, in accordance with District Rules 4305, 4306, and 4320 will be discussed in Section VIII, District Rule 4320 of this evaluation.

2. Monitoring

As required by District Rule 4305, *Boilers, Steam Generators and Process Heaters, Phase 2*, District Rule 4306, *Boilers, Steam Generators and Process Heaters, Phase 3*, and District Rule 4320 *Advanced Emission Reduction Options for Boilers, Steam*

**Attachment A:
Current PTO**

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1737-157-1

EXPIRATION DATE: 02/28/2014

SECTION: NW03 TOWNSHIP: 28S RANGE: 25E

EQUIPMENT DESCRIPTION:

63,000 GALLON (1,500 BBL) FIXED ROOF WASH TANK (T-01) WITH VAPOR CONTROL SHARED WITH S-1737-158, '-159, '-160, AND '-161 VENTING TO GAS SALES LINE, 41.7 MMBTU/HR COANDA TIP FLARE, AND/OR 2.0 MMBTU/HR PRODUCTION HEATER (S-1737-160)

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. The tank shall be equipped with a vapor loss prevention system capable of collecting all VOC emissions and preventing their emissions to the atmosphere at an efficiency of at least 95% by weight. [District Rule 4623] Federally Enforceable Through Title V Permit
3. The two-phase and three-phase separators shall vent to the vapor control system. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Fugitive VOC emissions shall be less than 0.5 lb/day. [District Rule 2201] 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 Rule 4623, 5.6.2] 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, 5.6.3] 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 to 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 more than 3 drops per minute. [District Rule 4623] Federally Enforceable Through Title V Permit
8. 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
9. All piping, fittings, and valves 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 provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [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.

10. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Gases from the vapor control system shall be incinerated in the 2.0 MMBtu/hr production heater (S-1737-160), 41.7 MMBtu/hr smokeless flare and/or shall be sent to gas sales line. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Gas rate to the production heater shall not exceed 40,000 scf per day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Flare shall be equipped with flared gas flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Gas rate to the flare shall not exceed 3.0 MMscf per day nor 438.0 MMscf per year. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Emission rates for the flare shall not exceed any of the following: PM10: 0.020 lb/MMBtu, NO_x (as NO₂): 0.068 lb/MMBtu, VOC: 0.033 lb/MMBtu, or CO: 0.038 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Sulfur content of gas burned in the flare or the heater shall not exceed 0.3 gr/100 scf as sulfur. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The sulfur content of the gas being incinerated shall be determined using ASTM Test Methods D3246, D4084, D4810, double GC for H₂S and mercaptans, or other method approved by the APCO. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Permittee shall measure sulfur content of gas incinerated at least once per year. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
19. The flame shall be present at all times when combustible gases are vented through the flare. [District Rule 4311, 5.2] Federally Enforceable Through Title V Permit
20. The outlet shall be equipped with an automatic ignition system, or, shall operate with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rule 4311, 5.3] Federally Enforceable Through Title V Permit
21. Except for flares equipped with a flow-sensing ignition system, a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present, shall be installed and operated. [District Rule 4311, 5.4] Federally Enforceable Through Title V Permit
22. Flares that use flow-sensing automatic ignition systems and which do not use a continuous flame pilot shall use purge gas for purging. [District Rule 4311, 5.5] Federally Enforceable Through Title V Permit
23. The operator of a fixed roof tank shall maintain all records of required monitoring data and support information. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Permittee shall maintain accurate records of the daily amounts and annual vapor H₂S concentration of the gas burned in the flare and production heater. [District Rule 2201] Federally Enforceable Through Title V Permit
25. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit
26. Formerly S-1132-82-0
27. Formerly S-4241-25-0

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1737-167-3

EXPIRATION DATE: 02/28/2014

SECTION: NE03 TOWNSHIP: 28S RANGE: 25E

EQUIPMENT DESCRIPTION:

14.6 MMBTU/HR PRODUCED GAS FLARE WITH COANDA EFFECT TIP AND PILOT AUTHORIZED TO BE USED AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE LIGHT OIL CENTRAL STATIONARY SOURCE

PERMIT UNIT REQUIREMENTS

1. Unit shall not be located within 1000 feet of any K-12 school. [CH&SC 42301.6]
2. Flare shall not be used within 500 feet of any business or residence. [District Rule 4102]
3. This flare is approved for use in well testing, tank and well vent control, and equipment shutdown, emergencies and other situation requiring a safety flare. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Permittee shall notify the District Compliance Division of each location at which the unit is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 1070] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
6. Flare shall operate in a smokeless manner (no greater than 5% opacity) except for three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Flare shall be equipped with volumetric flow rate indicator. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Gas flow rate to flare (not including pilot gas) shall not exceed 350,000 cubic feet per day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emission rates from this unit shall not exceed any of the following limits: NO_x (as NO₂) - 0.068 lb/MMBtu; VOC (as methane) - 0.063 lb/MMBtu; CO - 0.37 lb/MMBtu or PM₁₀ - 0.008 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Gas sulfur content shall not exceed 1.0 gr/100 scf. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
11. Gas shall be tested quarterly for sulfur content. Upon transfer of location or change in the method of operation of the flare (excluding emergencies), gas shall be tested weekly for sulfur content. If compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks then the fuel testing frequency shall be quarterly. If a quarterly fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2201]
12. The sulfur content of the gas being flared shall be determined using ASTM D1072, D3031, D4084, D3246, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 1081] 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.

13. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2201] Federally Enforceable Through Title V Permit
14. If fuel analysis is used to demonstrate compliance with conditions of this permit, the fuel higher heating value for each fuel shall be certified by a third party fuel supplier or determined by: ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2201] Federally Enforceable Through Title V Permit
15. A trained observer, as defined in EPA Method 22, shall check visible emissions at least once every two weeks for a period of 15 minutes. If visible emissions are detected at any time during this period, the observation period shall be extended to two hours. A record containing the results of these observations shall be maintained, which also includes company name, process unit, observer's name and affiliation, date, estimated wind speed and direction, sky condition, and the observer's location relative to the source and sun. [District Rules 2080 and 4101] Federally Enforceable Through Title V Permit
16. The flame shall be present at all times when combustible gases are vented through the flare. [District Rule 4311, 5.2] Federally Enforceable Through Title V Permit
17. The outlet shall be equipped with an automatic ignition system, or, shall operate with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rule 4311, 5.3] Federally Enforceable Through Title V Permit
18. Permittee shall obtain an ATC to modify any permit unit which authorizes this flare as a control device prior to this flare operating as a control device for that permit unit. [District Rule 2201]
19. Except for flares equipped with a flow-sensing ignition system, a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present, shall be installed and operated. [District Rule 4311, 5.4] Federally Enforceable Through Title V Permit
20. Flares that use flow-sensing automatic ignition systems and which do not use a continuous flame pilot shall use purge gas for purging. [District Rule 4311, 5.5] Federally Enforceable Through Title V Permit
21. The flare shall be inspected every two weeks while in operation for visible emissions. If visible emissions are observed, corrective action shall be taken. If visible emissions continue, an EPA method 9 test shall be conducted within 72 hours. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The flare shall be operated according to the manufacturer's specifications, a copy of which shall be maintained on site. [District Rule 2080] Federally Enforceable Through Title V Permit
23. Permittee shall maintain accurate daily records of volume, type, higher heating value, and sulfur content and of gas flared [District Rule 2201 & 1070] Federally Enforceable Through Title V Permit
24. Permittee shall maintain accurate records of location and duration of operation at each stationary source. [District Rule 2201 & 4409] Federally Enforceable Through Title V Permit
25. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 2201 & 4409] Federally Enforceable Through Title V Permit
26. Permittee shall maintain records of daily amount of total gas flared. Records shall be kept for a minimum of 5 years and shall be made readily available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT
ISSUANCE DATE: DRAFT

PERMIT NO: S-1737-168-2

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 1.8 MMSCFD AIR-ASSISTED FLARE OR GAS SALES PIPELINE: DESIGNATE FLARE SEPARATELY AS PERMIT UNIT S-1737-180-0

CONDITIONS

1. {1829} 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. 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
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

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-1737-168-2 : Apr 16 2012 12:05PM - DAVIDSOS : Joint Inspection NOT Required

5. 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
6. 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
7. 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
8. 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
9. 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
10. 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
11. 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
12. Heater treaters shall only be fired on PUC-quality natural gas or LPG. [District Rule 2201] Federally Enforceable Through Title V Permit
13. 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
14. 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
15. 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
16. 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

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1737-172-1

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: SW 23 TOWNSHIP: 27S RANGE: 23E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 300 BBL CRUDE OIL WASH TANK WITH VAPOR CONTROL SYSTEM INCLUDING COMPRESSOR, SERVED BY FLARE AND HYDROGEN SULFIDE SCAVENGER SYSTEM LISTED ON S-1737-178, SHARED WITH S-1737-173, -174, -175, & -176 (SEMITROPIC TANK BATTERY); ALLOW OPTION OF CONNECTING PORTABLE TANKS S-1737-181, '-182, '-183, OR '-184 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. Combined VOC emissions rate from the components associated with the tank and the vapor recovery system in gas, light liquid and light crude oil service shall not exceed 0.4 pounds per day. [District Rule 2201]
4. 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 the reduces the inlet VOC emissions by at least 95% 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

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

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DAVID WARNER, Director of Permit Services

S-1737-172-1 : Apr 16 2012 12:05PM - DAVIDSOS : Joint Inspection NOT Required

5. 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
6. 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
7. 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
8. VOC fugitive emissions from the components in gas service on tank and tank vapor collection system) shall not exceed 0.5. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. 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
11. 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
12. 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
13. 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
14. 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
15. 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
16. 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
17. 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

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CONDITIONS CONTINUE ON NEXT PAGE

18. 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]
19. Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
20. 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
21. 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
22. 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
23. 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
24. 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
25. 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
26. 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
27. 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
28. 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
29. 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
30. 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

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**Attachment B:
Emissions Calculations**

**Attachment C:
SSIPE Calculations**

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

OIL FIELD TANKS ZERO SO_x, PM₁₀ OR CO EMISSIONS
 REMOVED
 REMOVED
 REMOVED
 REMOVED
 REMOVED

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.

Region	Facility	Unit	Mod	NOx	SOx	PM10	CO	VOC	Number of Outstanding ATCs
S	1737	150	1	329	0	37	73	37	0
S	1737	151	1	329	0	37	73	37	0
S	1737	152	1	329	0	37	73	37	0
S	1737	153	1	329	0	37	73	37	0
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	1	30564	2927	8734	16571	14392	0
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	163	1	175	1	15	146	818	0
S	1737	167	3	8687	256	1022	47268	8048	0
S	1737	168	1	19820	183	2336	107785	18762	0
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	0
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

SSPE (lbs)	67014	3659	13055	198520	59494
<i>ATC 1737 199-0</i>		<u>42</u>	<u>608</u>	<u>2569</u>	
		3701	13,663	201,089	

Saturday, March 24, 2012

Page 2 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.

**Attachment D:
Health Risk Assessment**

San Joaquin Valley Air Pollution Control District Risk Management Review

To: Steve Davidson– Permit Services
 From: Kou Thao – Technical Services
 Date: 3-20-12
 Facility Name: Vintage Oil Production
 Location: Vintage's LOC stationary source
 Application #(s): S-1737- 181-0, -182-0, 183-0, -184-0
 Project #: S-1120604

A. RMR SUMMARY

RMR Summary						
Categories	Oilfield tank (181-0)	Oilfield tank (182-0)	Oilfield tank (183-0)	Oilfield tank (184-0)	Project Totals	Facility Totals
Prioritization Score	0.005	0.005	0.005	0.005	0.019	>1
Acute Hazard Index	1.64E-05	1.83E-05	1.83E-05	1.64E-05	6.94E-05	4.19E-02
Chronic Hazard Index	1.05E-05	1.22E-05	1.26E-05	1.26E-05	4.61E-05	5.96E-02
Maximum Individual Cancer Risk (10 ⁻⁶)	1.54E-08	1.78E-08	1.85E-08	1.58E-08	6.75E-08	2.13E-06
T-BACT Required?	No	No	No	No		
Special Permit Conditions?	Yes	Yes	Yes	Yes		

Proposed Permit Conditions

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

Unit # 181-0, 182-0, 183-0, & 184-0

The tank(s) shall not operate within 500 feet of the nearest receptor.

B. RMR REPORT

I. Project Description

Technical Services received a request on March 20, 2012 to perform a Risk Management Review for a proposed installation of 4 new 500 bbl oilfield tanks connected to existing vapor control systems to operate at various locations within Vintage Productions LOC stationary source.

Toxic emissions for this proposed unit 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 proposed units was less than 1.0 (see RMR Summary Table). Therefore, no further analysis was necessary.

The following parameters were used for the review:

Analysis Parameters for each Unit -181-0, 182-0, 183-0 & 184-0			
Closest Receptor - Business (m)	152.4	Closest Receptor - Resident (m)	152.4
VOC emissions (lbs/hr)	0.01	VOC emissions (lbs/yr)	73
Tank dimensions (m)	21.4 x 2.59	Tank Height (m)	4.05

III. Conclusion

The acute and chronic indices are below 1.0 and the cancer risk associated with the project is less than 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.

IV. Attachments

- A. RMR request from the project engineer
- B. Additional information from the applicant/project engineer
- C. Toxic emissions summary
- D. Prioritization score
- E. Facility Summary

**Attachment E:
Certificate of Conformity**

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

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

SIGNIFICANT PERMIT MODIFICATION
 MINOR PERMIT MODIFICATION

ADMINISTRATIVE
AMENDMENT

COMPANY NAME: 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: Vintage Production California LLC	
3. Agent to the Owner: Denny Brown	

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

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

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

Denny Brown
Signature of Responsible Official

3-1-12
Date

Denny Brown
Name of Responsible Official (please print)

Operations Manager
Title of Responsible Official (please print)

**Attachment F:
Draft ATCs**

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1737-157-2

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: NW03 TOWNSHIP: 28S RANGE: 25E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 63,000 GALLON (1,500 BBL) FIXED ROOF WASH TANK (T-01) WITH VAPOR CONTROL SHARED WITH S-1737-158, '-159, '-160, AND '-161 VENTING TO GAS SALES LINE, 41.7 MMBTU/HR COANDA TIP FLARE, AND/OR 2.0 MMBTU/HR PRODUCTION HEATER (S-1737-160): ALLOW OPTION OF CONNECTING PORTABLE TANKS S-1737-181, '-182, '-183, AND/OR '-184 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. 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 95% by weight as determined by the test method specified in Section 6.4.7. [District Rule 4623] Federally Enforceable Through Title V Permit
4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 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

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DAVID WARNER, Director of Permit Services

S-1737-157-2 : May 3 2012 1:36PM - DAVIDSOS : Joint Inspection NOT Required

5. 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 Rule 4623] Federally Enforceable Through Title V Permit
6. 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 Rule 4623] Federally Enforceable Through Title V Permit
7. VOC fugitive emissions from the components in gas service on tank and tank vapor collection system) shall not exceed 0.5. [District Rule 2201] Federally Enforceable Through Title V Permit
8. 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
9. 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
10. 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
11. 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
12. 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
13. 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
14. 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
15. 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
16. 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

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CONDITIONS CONTINUE ON NEXT PAGE

17. 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] Federally Enforceable Through Title V Permit
18. Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
19. 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
20. 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
21. 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
22. 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
23. 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
24. 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
25. 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
26. 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
27. 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
28. Gases from the vapor control system shall be incinerated in the 2.0 MMBtu/hr production heater (S-1737-160), 41.7 MMBtu/hr smokeless flare and/or shall be sent to gas sales line. [District Rule 2201] Federally Enforceable Through Title V Permit
29. Gas rate to the production heater shall not exceed 40,000 scf per day. [District Rule 2201] Federally Enforceable Through Title V Permit
30. Flare shall be equipped with flared gas flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

31. Gas rate to the flare shall not exceed 3.0 MMscf per day nor 438.0 MMscf per year. [District Rule 2201] Federally Enforceable Through Title V Permit
32. Emission rates for the flare shall not exceed any of the following: PM10: 0.020 lb/MMBtu, NOx (as NO2): 0.068 lb/MMBtu, VOC: 0.033 lb/MMBtu, or CO: 0.038 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
33. Sulfur content of gas burned in the flare or the heater shall not exceed 0.3 gr/100 scf as sulfur. [District Rule 2201] Federally Enforceable Through Title V Permit
34. The sulfur content of the gas being incinerated shall be determined using ASTM Test Methods D3246, D4084, D4810, double GC for H2S and mercaptans, or other method approved by the APCO. [District Rule 2201] Federally Enforceable Through Title V Permit
35. Permittee shall measure sulfur content of gas incinerated at least once per year. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
36. The flame shall be present at all times when combustible gases are vented through the flare. [District Rule 4311, 5.2] Federally Enforceable Through Title V Permit
37. The outlet shall be equipped with an automatic ignition system, or, shall operate with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rule 4311, 5.3] Federally Enforceable Through Title V Permit
38. Except for flares equipped with a flow-sensing ignition system, a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present, shall be installed and operated. [District Rule 4311, 5.4] Federally Enforceable Through Title V Permit
39. Flares that use flow-sensing automatic ignition systems and which do not use a continuous flame pilot shall use purge gas for purging. [District Rule 4311, 5.5] Federally Enforceable Through Title V Permit
40. 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
41. Permittee shall maintain accurate records of the daily amounts and annual vapor H2S concentration of the gas burned in the flare and production heater. [District Rule 2201] Federally Enforceable Through Title V Permit
42. 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
43. Formerly S-1132-82-0
44. Formerly S-4241-25-0

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1737-167-4

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: NE03 TOWNSHIP: 28S RANGE: 25E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 14.6 MMBTU/HR PRODUCED GAS FLARE WITH COANDA EFFECT TIP AND PILOT AUTHORIZED TO BE USED AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE LIGHT OIL CENTRAL STATIONARY SOURCE: AUTHORIZE COMBUSTION OF VAPORS FROM TANKS S-1737-181, '-182, '-183 AND/OR '-184

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. Unit shall not be located within 1000 feet of any K-12 school. [CH&SC 42301.6]
4. Flare shall not be used within 500 feet of any business or residence. [District Rule 4102]
5. This flare is approved for use in well testing, tank and well vent control, and equipment shutdown, emergencies and other situation requiring a safety flare. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Permittee shall notify the District Compliance Division of each location at which the unit is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 1070] 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-1737-167-4 : May 3 2012 1:36PM -- DAVIDSOS : Joint Inspection NOT Required

7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
8. Flare shall operate in a smokeless manner (no greater than 5% opacity) except for three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Flare shall be equipped with volumetric flow rate indicator. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Gas flow rate to flare (not including pilot gas) shall not exceed 350,000 cubic feet per day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Emission rates from this unit shall not exceed any of the following limits: NO_x (as NO₂) - 0.068 lb/MMBtu; VOC (as methane) - 0.063 lb/MMBtu; CO - 0.37 lb/MMBtu or PM₁₀ - 0.008 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Gas sulfur content shall not exceed 1.0 gr/100 scf. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
13. Gas shall be tested quarterly for sulfur content. Upon transfer of location or change in the method of operation of the flare (excluding emergencies), gas shall be tested weekly for sulfur content. If compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks then the fuel testing frequency shall be quarterly. If a quarterly fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2201]
14. The sulfur content of the gas being flared shall be determined using ASTM D1072, D3031, D4084, D3246, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
15. If the unit is fired on noncertified gaseous fuel and compliance with SO_x emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2201] Federally Enforceable Through Title V Permit
16. If fuel analysis is used to demonstrate compliance with conditions of this permit, the fuel higher heating value for each fuel shall be certified by a third party fuel supplier or determined by: ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2201] Federally Enforceable Through Title V Permit
17. A trained observer, as defined in EPA Method 22, shall check visible emissions at least once every two weeks for a period of 15 minutes. If visible emissions are detected at any time during this period, the observation period shall be extended to two hours. A record containing the results of these observations shall be maintained, which also includes company name, process unit, observer's name and affiliation, date, estimated wind speed and direction, sky condition, and the observer's location relative to the source and sun. [District Rules 2080 and 4101] Federally Enforceable Through Title V Permit
18. The flame shall be present at all times when combustible gases are vented through the flare. [District Rule 4311, 5.2] Federally Enforceable Through Title V Permit
19. The outlet shall be equipped with an automatic ignition system, or, shall operate with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rule 4311, 5.3] Federally Enforceable Through Title V Permit
20. Permittee shall obtain an ATC to modify any permit unit which authorizes this flare as a control device prior to this flare operating as a control device for that permit unit. [District Rule 2201]
21. Except for flares equipped with a flow-sensing ignition system, a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present, shall be installed and operated. [District Rule 4311, 5.4] Federally Enforceable Through Title V Permit
22. Flares that use flow-sensing automatic ignition systems and which do not use a continuous flame pilot shall use purge gas for purging. [District Rule 4311, 5.5] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

23. The flare shall be inspected every two weeks while in operation for visible emissions. If visible emissions are observed, corrective action shall be taken. If visible emissions continue, an EPA method 9 test shall be conducted within 72 hours. [District Rule 2201] Federally Enforceable Through Title V Permit
24. The flare shall be operated according to the manufacturer's specifications, a copy of which shall be maintained on site. [District Rule 2080] Federally Enforceable Through Title V Permit
25. Permittee shall maintain accurate daily records of volume, type, higher heating value, and sulfur content and of gas flared [District Rule 2201 & 1070] Federally Enforceable Through Title V Permit
26. Permittee shall maintain accurate records of location and duration of operation at each stationary source. [District Rule 2201 & 4409] Federally Enforceable Through Title V Permit
27. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 2201 & 4409] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1737-168-3

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 1.8 MMSCFD AIR-ASSISTED FLARE OR GAS SALES PIPELINE: ALLOW OPTION OF CONNECTING PORTABLE TANKS S-1737-181, '-182, '-183, AND/OR '-184 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

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Seyed Sadredin, Executive Director APCO

DRAFT

DAVID WARNER, Director of Permit Services

S-1737-168-3 : May 3 2012 1:36PM - DAVIDSOS : 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. [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

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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. Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
24. 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
25. 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
26. 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
27. 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
28. 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
29. 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

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CONDITIONS CONTINUE ON NEXT PAGE

30. 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
31. 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
32. 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
33. 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
34. 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
35. 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
36. 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

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1737-172-1

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: SW 23 TOWNSHIP: 27S RANGE: 23E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 300 BBL CRUDE OIL WASH TANK WITH VAPOR CONTROL SYSTEM INCLUDING COMPRESSOR, SERVED BY FLARE AND HYDROGEN SULFIDE SCAVENGER SYSTEM LISTED ON S-1737-178, SHARED WITH S-1737-173, -174, -175, & -176 (SEMITROPIC TANK BATTERY): ALLOW OPTION OF CONNECTING PORTABLE TANKS S-1737-181, '-182, '-183, AND/OR '-184 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. Combined VOC emissions rate from the components associated with the tank and the vapor recovery system in gas, light liquid and light crude oil service shall not exceed 0.4 pounds per day. [District Rule 2201]
4. 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 95% 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

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

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DAVID WARNER, Director of Permit Services

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5. 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
6. 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
7. 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
8. VOC fugitive emissions from the components in gas service on tank and tank vapor collection system) shall not exceed 0.5. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. 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
11. 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
12. 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
13. 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
14. 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
15. 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
16. 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
17. 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

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CONDITIONS CONTINUE ON NEXT PAGE

18. 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]
19. Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
20. 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
21. 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
22. 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
23. 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
24. 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
25. 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
26. 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
27. 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
28. 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
29. 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
30. 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

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1737-180-1

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

EQUIPMENT DESCRIPTION:

MODIFICATION OF 49 MMBTU/HR FLARE APPROVED FOR USE IN WELL TESTING, TANK AND WELL VENT CONTROL, EQUIPMENT SHUTDOWN, EMERGENCIES AND OTHER SITUATIONS REQUIRING A SAFETY FLARE AT VARIOUS UNSPECIFIED LOCATIONS: AUTHORIZE COMBUSTION OF VAPORS FROM TANKS S-1737-181, '-182, '-183 AND/OR '-184

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. Flare shall not be located within 1000 feet of any K-12 school. [CH&SC 42301.6]
4. Flare shall always operate at least 500 feet away from the closest receptor. [District Rule 4102]
5. Flare shall always operate at least 500 feet away from the facility's fenceline. [District Rule 4102]
6. Permittee shall notify the District Compliance Division of each location at which the flare is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 1070]
7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] 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

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DAVID WARNER, Director of Permit Services

S-1737-180-1 : May 3 2012 1:36PM -- DAVIDSOS : Joint Inspection NOT Required

8. Flare shall operate in a smokeless manner (0% opacity) except for three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Flare gas inlet line shall be equipped with operational volumetric totalizing flowrate indicator. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Gas flowrate to flare (not including pilot gas) shall not exceed 700,000 cubic feet per day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Emission rates from this unit shall not exceed any of the following limits: NO_x (as NO₂) - 0.068 lb/MMBtu; VOC (as methane) - 0.063 lb/MMBtu; CO - 0.37 lb/MMBtu or PM₁₀ - 0.008 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Gas sulfur content shall not exceed 0.25 gr/100 scf. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
13. Gas shall be tested quarterly for sulfur content. Upon transfer of location or change in the method of operation of the flare (excluding emergencies), gas shall be tested weekly for sulfur content. If compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks then the fuel testing frequency shall be quarterly. If a quarterly fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The sulfur content of the gas being flared shall be determined using ASTM D1072, D3031, D4084, D3246, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
15. If fuel analysis is used to demonstrate compliance with conditions of this permit, the fuel higher heating value for each fuel shall be certified by a third party fuel supplier or determined by: ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2201] Federally Enforceable Through Title V Permit
16. A trained observer, as defined in EPA Method 22, shall check visible emissions at least once every two weeks for a period of 15 minutes. If visible emissions are detected at any time during this period, the observation period shall be extended to two hours. A record containing the results of these observations shall be maintained, which also includes company name, process unit, observer's name and affiliation, date, estimated wind speed and direction, sky condition, and the observer's location relative to the source and sun. [District Rules 2080 and 4101] Federally Enforceable Through Title V Permit
17. The flame shall be present at all times when combustible gases are vented through the flare. [District Rule 4311] Federally Enforceable Through Title V Permit
18. The outlet shall be equipped with an automatic ignition system, or, shall operate with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rule 4311] Federally Enforceable Through Title V Permit
19. Permittee shall obtain an ATC to modify any permit unit which authorizes this flare as a control device prior to this flare operating as a control device for that permit unit. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Except for flares equipped with a flow-sensing ignition system, a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present, shall be installed and operated. [District Rule 4311] Federally Enforceable Through Title V Permit
21. Flares that use flow-sensing automatic ignition systems and which do not use a continuous flame pilot shall use purge gas for purging. [District Rule 4311] Federally Enforceable Through Title V Permit
22. Open flares (air-assisted, steam assisted or non-assisted) in which the flare gas pressure is less than 5 psig shall be operated in such a manner that meets the provisions of 40 CFR 60.18. [District Rule 4311] Federally Enforceable Through Title V Permit
23. The flare shall be inspected every two weeks while in operation for visible emissions. If visible emissions are observed, corrective action shall be taken. If visible emissions continue, an EPA method 9 test shall be conducted within 72 hours. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

24. The flare shall be operated according to the manufacturer's specifications, a copy of which shall be maintained on site. [District Rule 2080] Federally Enforceable Through Title V Permit
25. Permittee shall maintain accurate daily records of volume, type, higher heating value, and sulfur content of gas flared [District Rule 2201 & 1070] Federally Enforceable Through Title V Permit
26. Permittee shall maintain accurate records of location and duration of operation at each stationary source. [District Rule 2201, 4311 & 4409] Federally Enforceable Through Title V Permit
27. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 2201, 4311 & 4409] Federally Enforceable Through Title V Permit
28. ATC S-1737-180-0 shall be implemented prior to or concurrent with this ATC. [District Rule 2201]

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1737-181-0

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

EQUIPMENT DESCRIPTION:

500 BBL PORTABLE CRUDE OIL TANK CONNECT AUTHORIZED TO OPERATE AT VARIOUS UNSPECIFIED LOCATIONS AND CONNECT TO VAPOR CONTROL SYSTEMS LISTED ON PERMIT S-1737-157, '-168, '-172, OR FLARES S-1737-167 OR '180

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. Unit shall not be located within 1000 feet of any K-12 school. [CH&SC 42301.6]
4. 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 the reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.7. [District Rules 2201and 4623] Federally Enforceable Through Title V Permit
5. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and4623] 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

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DAVID WARNER, Director of Permit Services

S-1737-181-0 : May 3 2012 1:36PM -- DAVIDSOS : Joint Inspection NOT Required

6. 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
7. 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
8. VOC fugitive emissions from the components in gas service on tank and tank vapor collection system) shall not exceed 0.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. 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
11. 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
12. 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
13. 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
14. 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
15. 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
16. 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
17. 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

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CONDITIONS CONTINUE ON NEXT PAGE

18. 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]
19. Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
20. 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
21. 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
22. 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
23. 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
24. 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
25. 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
26. 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
27. 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
28. 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
29. 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
30. 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

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1737-182-0

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

EQUIPMENT DESCRIPTION:

500 BBL PORTABLE CRUDE OIL TANK CONNECT AUTHORIZED TO OPERATE AT VARIOUS UNSPECIFIED LOCATIONS AND CONNECT TO VAPOR CONTROL SYSTEMS LISTED ON PERMIT S-1737-157, '-168, '-172, OR FLARES S-1737-167 OR '180

ISSUANCE DATE: DRAFT

DRAFT

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. Unit shall not be located within 1000 feet of any K-12 school. [CH&SC 42301.6]
4. 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 the reduces the inlet VOC emissions by at least 95% 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
5. 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

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director APCO

DAVID WARNER, Director of Permit Services

S-1737-182-0 : May 3 2012 1:38PM -- DAVIDSOS : Joint Inspection NOT Required

6. 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
7. 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
8. VOC fugitive emissions from the components in gas service on tank and tank vapor collection system) shall not exceed 0.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
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11. 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
12. 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
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CONDITIONS CONTINUE ON NEXT PAGE

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21. 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
22. 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
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25. 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
26. 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
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30. 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

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1737-183-0

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

EQUIPMENT DESCRIPTION:

500 BBL PORTABLE CRUDE OIL TANK CONNECT AUTHORIZED TO OPERATE AT VARIOUS UNSPECIFIED LOCATIONS AND CONNECT TO VAPOR CONTROL SYSTEMS LISTED ON PERMIT S-1737-157, '-168, '-172, OR FLARES S-1737-167 OR '180

CONDITIONS

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4. 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 the reduces the inlet VOC emissions by at least 95% 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
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CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director, APCO

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DAVID WARNER, Director of Permit Services

S-1737-183-0 : May 3 2012 1:38PM - DAVIDSOS : Joint Inspection NOT Required

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CONDITIONS CONTINUE ON NEXT PAGE

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21. 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
22. 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
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24. 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
25. 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
26. 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
27. 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
28. 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
29. 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
30. 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

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-1737-184-0

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

EQUIPMENT DESCRIPTION:

500 BBL PORTABLE CRUDE OIL TANK CONNECT AUTHORIZED TO OPERATE AT VARIOUS UNSPECIFIED LOCATIONS AND CONNECT TO VAPOR CONTROL SYSTEMS LISTED ON PERMIT S-1737-157, '-168, '-172, OR FLARES S-1737-167 OR '180

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. Unit shall not be located within 1000 feet of any K-12 school. [CH&SC 42301.6]
4. 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 the reduces the inlet VOC emissions by at least 95% 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
5. 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

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-1737-184-0 : May 3 2012 1:36PM - DAVIDSOS : Joint Inspection NOT Required

6. 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
7. 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
8. VOC fugitive emissions from the components in gas service on tank and tank vapor collection system) shall not exceed 0.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. 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
11. 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
12. 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
13. 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
14. 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
15. 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
16. 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
17. 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

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CONDITIONS CONTINUE ON NEXT PAGE

18. 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]
19. Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
20. 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
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