



DEC 08 2014

Mr. John Ludwick  
Aera Energy LLC  
PO Box 11164  
Bakersfield, CA 93389

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)  
District Facility # S-1547  
Project # S-1142831**

Dear Mr. Ludwick:

Enclosed for your review is the District's analysis of an application for Authorities to Construct for the facility identified above. You requested that Certificates of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The project was to revise the tank cleaning notification requirements from hour to equivalent days to match other tanks at the facility.

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

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

Thank you for your cooperation in this matter.

Sincerely,

  
Arnaud Marjollet  
Director of Permit Services

Enclosures

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

Seyed Sadredin  
Executive Director/Air Pollution Control Officer

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**Northern Region**  
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# San Joaquin Valley Air Pollution Control District

## Authority to Construct Application Review

Facility Name: Aera Energy LLC  
Mailing Address: PO Box 11164  
Bakersfield, CA 93389  
Contact Person: John Ludwick  
Telephone: 661-665-4472  
Fax: 661-665-7437  
E-Mail: [jjludwick@aeraenergy.com](mailto:jjludwick@aeraenergy.com)  
Application #(s): S-1547-888-16, '-1115-5, '-1123-2, '-1124-2  
Project #: S-1142831  
Deemed Complete: July 8, 2014

Date: November 10, 2014  
Engineer: Dan Klevann  
Lead Engineer: ~~Richard Karrs~~ *AP SWP AOE*

NOV 17 2014

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### I. Proposal

The primary business of Aera Energy LLC (Aera) is oil production. Aera has submitted an Authority to Construct (ATC) application for the following:

- Revise tank cleaning and notification requirement conditions on four tanks. The revision is to change the notification requirement from hours to the equivalent days.

Per FYI-111, ATC, Title V, and NSR Applicability Determinations, Item 2, modifying monitoring and record keeping requirements, provided the change does not lessen the stringency of an emissions limit is not a change in the method of operation of the tank cleaning requirements. Modifying the time for notifications from listing in hours to listing in equivalent days is not a modification because there is no change in the allowed time for notifications; therefore, Rule 2201 does not apply. The correction of tank cleaning notification requirements to three days as called out in Rule 4623 also is not a modification.

Aera received their Title V Permit on 1/31/2003. This modification can be classified as a Title V minor modification pursuant to Rule 2520, 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. Aera must apply to administratively amend their Title V permit.

### II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (4/21/11)
Rule 2410	Prevention of Significant Deterioration (6/16/11)
Rule 2520	Federally Mandated Operating Permits (6/21/01)
Rule 4001	New Source Performance Standards (4/14/99) is not applicable. This subpart does not apply to vessels with a design capacity $\leq 1,589.874 \text{ m}^3$

(≤ 420,000 gallons) used for petroleum or condensate stored, processed, or treated prior to custody transfer. The capacity of these tanks is ≤ 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 4002 National Emissions Standards for Hazardous Air Pollutants (5/20/04)  
Rule 4101 Visible Emissions (2/17/05)  
Rule 4102 Nuisance (12/17/92)  
Rule 4623 Storage of Organic Liquids (5/19/05)  
CH&SC 41700 Health Risk Assessment  
CH&SC 42301.6 School Notice  
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)  
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

### III. Project Location

The equipment will be located at the Section 2 Dehydration Facility in the Cymric Oil Field, within the SW/4 of Section 2, Township 29S, Range 21E. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

### IV. Process Description

The Anderson/Fitzgerald Dehydration Facility handles heavy oil production from the Cymric area. To accomplish this task, free water knockout vessels, surge vessels, induced static flotation units, and tanks serve to separate the crude oil from entrained water.

### V. Equipment Listing

#### Pre-Project Equipment Description:

- S-1547-888-16: 7500 BBL (315,000 GALLON) FIXED ROOF CRUDE OIL STORAGE TANK F-4304 VENTED TO SHARED VAPOR CONTROL SYSTEM WITH COMPRESSOR(S), PUMP(S), COOLER(S) LIQUID KNOCKOUT(S), PRESSURE VESSEL(S), PIPING TO S-1547-359, AND PIPING TO THE SECTION 32 GAS PLANT (FACILITY S-1543)
- S-1547-1115-3: 25,900 GALLON INDUCED STATIC FLOTATION CELL VENTED TO SHARED VAPOR CONTROL SYSTEM LISTED ON S-1547-704 (A/F DEHY)
- S-1547-1123-1: 12 FT DIA X 65 FT SHELL LENGTH 55,000 GALLON FREE WATER KNOCKOUT VESSEL VENTED TO SHARED VAPOR CONTROL SYSTEM LISTED ON S-1547-888 (DEHY 2)
- S-1547-1124-1: 12 FT DIA X 65 FT SHELL LENGTH 55,000 GALLON FREE WATER KNOCKOUT VESSEL VENTED TO SHARED VAPOR CONTROL SYSTEM LISTED ON S-1547-888 (DEHY 2)

Proposed Modification:

Revise the tank cleaning notification periods to reference days instead of hours.

- S-1547-888-18: MODIFICATION OF 7500 BBL (315,000 GALLON) FIXED ROOF CRUDE OIL STORAGE TANK F-4304 VENTED TO SHARED VAPOR CONTROL SYSTEM WITH COMPRESSOR(S), PUMP(S), COOLER(S) LIQUID KNOCKOUT(S), PRESSURE VESSEL(S), PIPING TO S-1547-359, AND PIPING TO THE SECTION 32 GAS PLANT (FACILITY S-1543):REVISE TANK CLEANING NOTIFICATION REQUIREMENT
- S-1547-1115-5: MODIFICATION OF 25,900 GALLON INDUCED STATIC FLOTATION CELL VENTED TO SHARED VAPOR CONTROL SYSTEM LISTED ON S-1547-704 (A/F DEHY):REVISE TANK CLEANING NOTIFICATION REQUIREMENT
- S-1547-1123-2: MODIFICATION OF 12 FT DIA X 65 FT SHELL LENGTH 55,000 GALLON FREE WATER KNOCKOUT VESSEL VENTED TO SHARED VAPOR CONTROL SYSTEM LISTED ON S-1547-888 (DEHY 2): REVISE TANK CLEANING NOTIFICATION REQUIREMENT
- S-1547-1124-2: MODIFICATION OF 12 FT DIA X 65 FT SHELL LENGTH 55,000 GALLON FREE WATER KNOCKOUT VESSEL VENTED TO SHARED VAPOR CONTROL SYSTEM LISTED ON S-1547-888 (DEHY 2): REVISE TANK CLEANING NOTIFICATION REQUIREMENT

Post Project Equipment Description:

- S-1547-888-18: 7500 BBL (315,000 GALLON) FIXED ROOF CRUDE OIL STORAGE TANK F-4304 VENTED TO SHARED VAPOR CONTROL SYSTEM WITH COMPRESSOR(S), PUMP(S), COOLER(S) LIQUID KNOCKOUT(S), PRESSURE VESSEL(S), PIPING TO S-1547-359, AND PIPING TO THE SECTION 32 GAS PLANT (FACILITY S-1543)
- S-1547-1115-5: 25,900 GALLON INDUCED STATIC FLOTATION CELL VENTED TO SHARED VAPOR CONTROL SYSTEM LISTED ON S-1547-704 (A/F DEHY)
- S-1547-1123-2: 12 FT DIA X 65 FT SHELL LENGTH 55,000 GALLON FREE WATER KNOCKOUT VESSEL VENTED TO SHARED VAPOR CONTROL SYSTEM LISTED ON S-1547-888 (DEHY 2)
- S-1547-1124-2: 12 FT DIA X 65 FT SHELL LENGTH 55,000 GALLON FREE WATER KNOCKOUT VESSEL VENTED TO SHARED VAPOR CONTROL SYSTEM LISTED ON S-1547-888 (DEHY 2)

## **VI. Emission Control Technology Evaluation**

The vapor control system (VCS) reduces the VOC emissions from the subject equipment by at least 99%. The VCS process routes the collected, uncondensed vapors to either the Section 32 gas plant (S-1543) or to the TEOR vapor collection system S-1547-359. Fugitive component VOC emissions are monitored by a District-approved I&M program.

## **VII. General Calculations**

Per FYI-111, ATC, Title V, and NSR Applicability Determinations, Item 2, Rule 2201 does not apply and calculations are not required.

## **VIII. Compliance**

### **Rule 2201 New and Modified Stationary Source Review Rule**

Per FYI-111, ATC, Title V, and NSR Applicability Determinations, Item 2, modifying monitoring and record keeping requirements, provided the change does not lessen the stringency of an emissions limit is not a change in the method of operation of the tank cleaning requirements. Modifying the time for notifications from listing in hours to listing in equivalent days is not a modification because there is no change in the allowed time for notifications; therefore, Rule 2201 does not apply.

### **Rule 2520 Federally Mandated Operating Permits**

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

In accordance with Rule 2520, these modifications:

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

6. Do not seek to consolidate overlapping applicable requirements.

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

#### **Rule 4001 New Source Performance Standards (NSPS)**

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 4002 National Emission Standards for Hazardous Air Pollutants (NESHAPs)**

This rule incorporates NESHAPs from Part 61, Chapter I, Subchapter C, Title 40, CFR and the NESHAPs from Part 63, Chapter I, Subchapter C, Title 40, CFR; and applies to all sources of hazardous air pollution listed in 40 CFR Part 61 or 40 CFR Part 63. However, no subparts of 40 CFR Part 61 or 40 CFR Part 63 apply to this project for oilfield tanks and production operations.

#### **Rule 4101 Visible Emissions**

Rule 4101 states that no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity). As long as the equipment is properly maintained and operated, compliance with visible emissions limits is expected under normal operating conditions.

#### **Rule 4102 Nuisance**

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

## **California Health & Safety Code 41700 (Health Risk Assessment)**

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

As demonstrated above, there are no increases in emissions associated with this project, therefore a health risk assessment is not necessary and no further risk analysis is required.

## **Rule 4623 Storage of Organic Liquids**

This rule limits volatile organic compound (VOC) emissions from the storage of organic liquids with true vapor pressures (TVP) of 0.5 psia or greater in any tank with a design capacity of 1,100 gallons or greater. The tank is currently in compliance with this rule. The administrative changes proposed in this project will not affect the compliance status of the rule. Continued compliance is expected.

## **California Health & Safety Code 42301.6 (School Notice)**

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

## **California Environmental Quality Act (CEQA)**

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

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

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

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

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

## IX. Recommendation

Compliance with all applicable rules and regulations is expected. Issue ATC's S-1547-888-18, S-1547-1115-5, S-1547-1123-2 and S-1547-1124-2 subject to the permit conditions on the attached draft ATC's in **Appendix C**.

## X. Billing Information

<b>Annual Permit Fees</b>			
Permit Number	Fee Schedule	Fee Description	Annual Fee
S-1547-888-18	3020-05-E	315,000 gallons	\$246.00
S-1547-1115-5	3020-05-C	25,900 gallons	\$135.00
S-1547-1123-2	3020-05-D	55,000 gallons	\$185.00
S-1547-1124-2	3020-05-D	55,000 gallons	\$185.00

## Appendixes

- A: Current PTO's
- B: Compliance Certification
- C: Draft ATC's

**APPENDIX A**  
**Current PTOs**

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1547-888-16

**EXPIRATION DATE:** 05/31/2016

**SECTION:** SW2 **TOWNSHIP:** 29S **RANGE:** 21E

## **EQUIPMENT DESCRIPTION:**

7500 BBL (315,000 GALLON) FIXED ROOF CRUDE OIL STORAGE TANK F-4304 VENTED TO SHARED VAPOR CONTROL SYSTEM WITH COMPRESSOR(S), PUMP(S), COOLER(S) LIQUID KNOCKOUT(S), PRESSURE VESSEL(S), PIPING TO S-1547-359, AND PIPING TO THE SECTION 32 GAS PLANT (FACILITY S-1543)

## **PERMIT UNIT REQUIREMENTS**

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1. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rules 2080 and 4623] Federally Enforceable Through Title V Permit
2. Permittee shall conduct tank cleaning and maintenance operations in accordance with District approved procedure as described in this permit. [District Rules 2080 and 4623] Federally Enforceable Through Title V Permit
3. Tank may be disconnected from vapor control system during District approved cleaning and maintenance procedures as described in this permit. [District Rules 2080 and 4623] Federally Enforceable Through Title V Permit
4. Permittee shall notify the District Compliance division at least 24 hours before tank cleaning and vapor control system disconnection and within 72 hours after restoring crude oil flow to the tank. [District Rules 2080 and 4623] Federally Enforceable Through Title V Permit
5. Prior to opening the tank to allow tank cleaning one of the following procedures must be followed: 1) operate the vapor recovery system for at least 24 hours after all the liquid in the tank has been drained, 2) displace vapors floating the oil pad off with water such that 90% of the tank volume is displaced, 3) vent the tank to the vapor control system until the vapor concentration is less than 10% of the lower explosive limit (LEL) or 5,000 ppmv whichever is less; or 4) vent the tank to the vapor control system for a length of time determined by the following relationship:  $t = 2.3 V / Q$ , where  $t$  = time,  $V$  = tank volume (cubic feet), and  $Q$  = flow rate to the vapor control system as determined using appropriate engineering calculations. [District Rules 2080 and 4623] Federally Enforceable Through Title V Permit
6. The tank shall be cleaned using one of the following methods: water, hot water, solvents with an initial boiling point of greater than 302 F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams VOC per liter or less. The tank sediment shall be used for road mix as allowed by Section 6.17 of District Rule 2020. [District Rules 2080 and 4623] Federally Enforceable Through Title V Permit
7. Steam cleaning shall be allowed only during December through March, or at locations where wastewater treatment facilities are limited. [District Rules 2080 and 4623] Federally Enforceable Through Title V Permit
8. Prior to reintroducing crude oil/water to the tank, the vapor recovery system shall be operational. The tank may be filled with water to minimize the tank headspace prior to restarting the vapor recovery system. [District Rules 2080 and 4623] Federally Enforceable Through Title V Permit
9. Within 48 hours after refilling the tank with crude oil/water, the pressure relief valve seats and hatch seals shall be inspected for leaks using EPA method 21 and the regular tank maintenance and inspection program shall resume. [District Rules 2080 and 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

10. Permittee shall maintain records of each period of cleaning and maintenance when the tank is disconnected or isolated from the vapor control system. Records shall include the date that tank cleaning was initiated, the date tank cleaning was completed, the method of tank cleaning used, and a description of internal and external tank repairs and maintenance performed. Such records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2080 and 4623] Federally Enforceable Through Title V Permit
11. The following Dehy 2 permit units shall be tied into the shared vapor recovery system, TEOR S-1547-359: '-888, '-889, '-890, '-891, '-892, '-893, '-894, '-895, '-896, '-897, '-898, '-899, '-902, '-903, '-904, '-905, '-906, '-944, '-945, '-946, '-947, '-948, '-949, '-950, '-951, '-1014, '-1015, '-1019, '-1116, '-1117, '-1119, '-1123, and '-1124. [District Rule 2201] Federally Enforceable Through Title V Permit
12. This vapor recovery system is authorized to receive recovered gas from the Anderson/Fitzgerald Dehydration facility including units S-1547-378, '-379, '-380, '-383, '-407, '-408, '-410, '-411, '-704, '-1100, '-1101, '-1102, '-1106, '-1115, and '-1121. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Drain valves shall only drain into covered containers which shall be emptied into tanks with vapor control system. [District Rule 2201] Federally Enforceable Through Title V Permit
14. VOC fugitive emissions from this tank and tank vapor control system including vapor control system trunk line prior to intertie with TEOR S-1547-359 shall not exceed 96.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Permittee shall maintain with the permit accurate fugitive component counts for tank and tank vapor control system, including vapor control system trunk line, according to Table 2-4 (Oil and Gas Production Operations Average Emission Factors) of USEPA's protocol for Equipment Emission Estimates - EPA -453/R-95-017. [District Rule 2201]
16. The tank shall be equipped with a fixed roof with no holes or openings. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The operator shall keep accurate records of types, storage temperature and true vapor pressure of liquids stored. [District Rule 4623] Federally Enforceable Through Title V Permit
18. 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. Collected vapors shall be directed to approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in Section 6.4.7. [District Rules 2201 & 4623, 5.6.1] Federally Enforceable Through Title V Permit
19. All tank seams, joints, piping, valves and fittings shall be constructed and maintained in a leak-free condition except during interior tank cleaning. [District Rule 4623, 5.6.3] Federally Enforceable Through Title V Permit
20. 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 ppmv, above background, as measured by a portable hydrocarbon detection instrument 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 Rule 4623, 3.11, 3.17 and 3.18] Federally Enforceable Through Title V Permit
21. Except as otherwise provided in this permit, 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, 3.9 and 6.4.8] Federally Enforceable Through Title V Permit
22. 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
23. 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 Rule 4623, 5.7 (Table 3)] 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.

24. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
25. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) Eliminate or minimize the leak within 8 hours after detection. (b) If the leak can not 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 detection. (c) In no event that the total time to minimize and eliminate the leak shall exceed 56 hours after detection. [District Rule 4623, 5.7 9 (Table 3)] Federally Enforceable Through Title V Permit
26. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit or District Rule 4623. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of SJVUAPCD Rule 4623. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
27. If a component type for a given tank is found to leak during an annual inspection, then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, then revert to annual inspections. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
28. Any component found to be leaking on two consecutive annual inspections is in violation of SJVUAPCD Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rule 4623, 5.7 (Table 3)] 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 Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
30. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
31. The control efficiency of the VOC construction device, measured and calculated as carbon, shall be determined by US EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case US EPA Method 25a may be used. US EPA Method 18 may be used in lieu of US EPA Method 25 or US EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of the known analytes/compounds to ensure that the VOC concentrations are neither under-reported or over-reported. Analysis of halogenated exempt compounds shall be analyzed by ARB Method 422 "Exempt Halogenated VOCs in Gases September 12, 1990". [District Rule 4623, 6.4.6, 6.4.7] Federally Enforceable Through Title V Permit
32. The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times and shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
33. The operator of a fixed roof tank shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
34. Note: Formerly S-1511-398.

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1547-1115-3

**EXPIRATION DATE:** 05/31/2016

**SECTION:** SE 26 **TOWNSHIP:** 29S **RANGE:** 21E

**EQUIPMENT DESCRIPTION:**

25,900 GALLON INDUCED STATIC FLOTATION CELL VENTED TO SHARED VAPOR CONTROL SYSTEM LISTED ON S-1547-704 (A/F DEHY)

## PERMIT UNIT REQUIREMENTS

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1. Tank gauging or sampling devices shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 2201] Federally Enforceable Through Title V Permit
2. All piping valves and fittings shall be constructed and maintained in a gas tight condition. 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. [District Rule 2201] Federally Enforceable Through Title V Permit
3. VOC emission rate from vapor control components associated with this emissions unit shall not exceed 10.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The true vapor pressure (TVP) of any liquid placed, stored or held in the tank shall be less than 0.5 psia at storage temperature. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Permittee shall maintain an accurate fugitive component count and resultant emissions calculated using emission factors from U.S. EPA Publication 453/R-95-017, or other District approved factors. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times and shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. All piping, fittings, and valves directly affixed to the tank or associated with the tank vapor recovery system 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 2520, 9.4.2] Federally Enforceable Through Title V Permit
8. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

9. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Emissions from components which have been tagged by the facility operator for repair within 15 calendar days or which have been repaired and are awaiting re-inspection shall not be in violation of this permit. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
12. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
13. 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 2520, 9.4.2] Federally Enforceable Through Title V Permit
14. This permit authorizes induced static flotation unit cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2080] Federally Enforceable Through Title V Permit
15. Permittee shall conduct induced static flotation unit cleaning and maintenance operations in accordance with District approved procedure as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
16. Induced static flotation unit may be disconnected from vapor control system during District approved cleaning and maintenance procedures as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
17. Permittee shall notify the District Compliance division at least 48 hours before induced static flotation unit cleaning and vapor control system disconnection and within 72 hours after restoring crude oil flow to the tank. [District Rule 2080] Federally Enforceable Through Title V Permit
18. Prior to opening the induced static flotation unit to allow cleaning the following procedures must be followed: Operate PV valve and vapor recovery system (if equipped) during emptying, filling, and flushing. During filling and purging, no vapor leakage is allowed. Drain all liquid from the induced static flotation unit to the maximum extent feasible prior to opening the induced static flotation unit. [District Rule 2080] Federally Enforceable Through Title V Permit
19. Prior to opening the induced static flotation unit to allow tank cleaning one of the following options must be followed: 1) operate the vapor recovery system for at least 24 hours after all the liquid in the induced static flotation unit has been drained to the maximum extent feasible, 2) displace vapors floating the oil pad off with water such that 90% of the induced static flotation unit liquid capacity is displaced, 3) vent the induced static flotation unit to the vapor control system until the vapor concentration is less than 10% of the lower explosive limit (LEL) or 5,000 ppmv whichever is less; or 4) vent the induced static flotation unit to the vapor control system for a length of time determined by the following relationship:  $t = 2.3 V/Q$ , where  $t$  = time,  $V$  = induced static flotation unit volume (cubic feet), and  $Q$  = flow rate to the vapor control system as determined using appropriate engineering calculations . [District Rule 2080] 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.

20. The induced static flotation unit shall be cleaned using water, hot water, solvents with an initial boiling point of greater than 302 F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams VOC per liter or less. Sediment may be used for road mix as allowed by Section 6.17 of District Rule 2020. [District Rule 2080] Federally Enforceable Through Title V Permit
21. Steam cleaning shall be allowed only during December through March, or at locations where wastewater treatment facilities are limited. [District Rule 2080] Federally Enforceable Through Title V Permit
22. Prior to reintroducing crude oil/water to the induced static flotation unit, the induced static flotation unit shall be filled to the maximum possible level with water or an organic liquid with a TVP less than 0.5 psia, the tank vapor control system shall be reactivated, and the liquid level shall be adjusted as necessary. Pressure/relief valve shall not open during filling of the induced static flotation unit. [District Rule 2080] Federally Enforceable Through Title V Permit
23. Within 48 hours after refilling the induced static flotation unit with crude oil/water, the pressure relief valve seats and hatch seals shall be inspected for leaks using EPA method 21 and the regular tank maintenance and inspection program shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
24. Permittee shall maintain records of each period of cleaning and maintenance when the induced static flotation unit is disconnected or isolated from the vapor control system. Records shall include the date that induced static flotation unit cleaning was initiated, the date induced static flotation unit cleaning was completed, the method of induced static flotation unit cleaning used, and a description of internal and external induced static flotation unit repairs and maintenance performed. Such records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit
25. All records shall be maintained and retained on the premises for a period of at least five years and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1547-1123-1

**EXPIRATION DATE:** 05/31/2016

**SECTION:** SW2 **TOWNSHIP:** 29S **RANGE:** 21E

**EQUIPMENT DESCRIPTION:**

12 FT DIA X 65 FT SHELL LENGTH 55,000 GALLON FREE WATER KNOCKOUT VESSEL VENTED TO SHARED VAPOR CONTROL SYSTEM LISTED ON S-1547-888 (DEHY 2)

## PERMIT UNIT REQUIREMENTS

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1. FWKO shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from FWKO and a VOC control device. The vessel and APCO-approved vapor control system, including piping, valves, and fittings, shall be maintained in a gas tight condition. [District Rule 2201] Federally Enforceable Through Title V Permit
2. FWKO shall be designed and maintained to vent only to vapor control system S-1547-888 and an operational flow check valve shall be operational (except during times when vapor control system line is closed) downstream of the FWKO dome gas separator. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The operator shall ensure that the vapor control system is functional and is operating as designed at all times and shall monitor vapor control compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. VOC emission rate from vapor control components associated with this emissions unit shall not exceed 13.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Permittee shall maintain an accurate fugitive component count and resultant emissions calculated using emission factors from U.S. EPA Publication 453/R-95-017, or other District approved factors. [District Rule 2201] 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. [District Rule 2520] Federally Enforceable Through Title V Permit
7. Except as otherwise provided in this permit, a reading in excess of 10,000 ppmv above background is a violation of this permit and shall be reported as a deviation. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Any FWKO gauging or sampling device shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

9. All piping, fittings, and valves directly affixed to the FWKO or associated with the FWKO vapor control system 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 FWKO 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 FWKO 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 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Emissions from components which have been tagged by the facility operator for repair within 15 calendar days or which have been repaired and are awaiting re-inspection shall not be in violation of this permit. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. 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 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. This permit authorizes FWKO cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2080] Federally Enforceable Through Title V Permit
17. Permittee shall conduct FWKO cleaning and maintenance operations in accordance with District approved procedure as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
18. FWKO may be disconnected from vapor control system during District approved cleaning and maintenance procedures as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
19. Permittee shall notify the District Compliance division at least 48 hours before FWKO cleaning and vapor control system disconnection and within 72 hours after restoring crude oil flow to the vessel. [District Rule 2080] 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.

20. Prior to opening the FWKO to allow cleaning the following procedures must be followed: Operate PV valve and vapor control system (if equipped) during emptying, filling, and flushing. During filling and purging, no vapor leakage is allowed. Drain all liquid from the FWKO to the maximum extent feasible prior to opening the FWKO. [District Rule 2080] Federally Enforceable Through Title V Permit
21. Prior to opening the FWKO to allow FWKO cleaning one of the following options must be followed: 1) operate the vapor control system for at least 24 hours after all the liquid in the FWKO has been drained to the maximum extent feasible, 2) displace vapors floating the oil pad off with water such that 90% of the FWKO liquid capacity is displaced, 3) vent the FWKO to the vapor control system until the vapor concentration is less than 10% of the lower explosive limit (LEL) or 5,000 ppmv whichever is less; or 4) vent the FWKO to the vapor control system for a length of time determined by the following relationship:  $t = 2.3 V/Q$ , where  $t$  = time,  $V$  = FWKO volume (cubic feet), and  $Q$  = flow rate to the vapor control system as determined using appropriate engineering calculations. [District Rule 2080] Federally Enforceable Through Title V Permit
22. The FWKO shall be cleaned using water, hot water, solvents with an initial boiling point of greater than 302 F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams VOC per liter or less. Sediment may be used for road mix as allowed by Section 6.17 of District Rule 2020. [District Rule 2080] Federally Enforceable Through Title V Permit
23. Steam cleaning shall be allowed only during December through March, or at locations where wastewater treatment facilities are limited. [District Rule 2080] Federally Enforceable Through Title V Permit
24. Prior to reintroducing crude oil/water to the FWKO, the FWKO unit shall be filled to the maximum possible level with water or an organic liquid with a TVP less than 0.5 psia, the vessel vapor control system shall be reactivated, and the liquid level shall be adjusted as necessary. Pressure/relief valve shall not open during filling of the FWKO. [District Rule 2080] Federally Enforceable Through Title V Permit
25. Within 48 hours after refilling the FWKO with crude oil/water, the pressure relief valve seats and hatch seals shall be inspected for leaks using EPA method 21 and the regular vessel maintenance and inspection program shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
26. All records shall be maintained and retained on the premises for a period of at least five years and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1547-1124-1

**EXPIRATION DATE:** 05/31/2016

**SECTION:** SW2 **TOWNSHIP:** 29S **RANGE:** 21E

**EQUIPMENT DESCRIPTION:**

12 FT DIA X 65 FT SHELL LENGTH 55,000 GALLON FREE WATER KNOCKOUT VESSEL VENTED TO SHARED VAPOR CONTROL SYSTEM LISTED ON S-1547-888 (DEHY 2)

## PERMIT UNIT REQUIREMENTS

---

1. FWKO shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from FWKO and a VOC control device. The vessel and APCO-approved vapor control system, including piping, valves, and fittings, shall be maintained in a gas tight condition. [District Rule 2201] Federally Enforceable Through Title V Permit
2. FWKO shall be designed and maintained to vent only to vapor control system S-1547-888 and an operational flow check valve shall be operational (except during times when vapor control system line is closed) downstream of the FWKO dome gas separator. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The operator shall ensure that the vapor control system is functional and is operating as designed at all times and shall monitor vapor control compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. VOC emission rate from vapor control components associated with this emissions unit shall not exceed 13.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Permittee shall maintain an accurate fugitive component count and resultant emissions calculated using emission factors from U.S. EPA Publication 453/R-95-017, or other District approved factors. [District Rule 2201] 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. [District Rule 2520] Federally Enforceable Through Title V Permit
7. Except as otherwise provided in this permit, a reading in excess of 10,000 ppmv above background is a violation of this permit and shall be reported as a deviation. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Any FWKO gauging or sampling device shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

9. All piping, fittings, and valves directly affixed to the FWKO or associated with the FWKO vapor control system 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 FWKO 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 FWKO 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 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Emissions from components which have been tagged by the facility operator for repair within 15 calendar days or which have been repaired and are awaiting re-inspection shall not be in violation of this permit. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. 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 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. This permit authorizes FWKO cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2080] Federally Enforceable Through Title V Permit
17. Permittee shall conduct FWKO cleaning and maintenance operations in accordance with District approved procedure as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
18. FWKO may be disconnected from vapor control system during District approved cleaning and maintenance procedures as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
19. Permittee shall notify the District Compliance division at least 48 hours before FWKO cleaning and vapor control system disconnection and within 72 hours after restoring crude oil flow to the vessel. [District Rule 2080] 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.

20. Prior to opening the FWKO to allow cleaning the following procedures must be followed: Operate PV valve and vapor control system (if equipped) during emptying, filling, and flushing. During filling and purging, no vapor leakage is allowed. Drain all liquid from the FWKO to the maximum extent feasible prior to opening the FWKO. [District Rule 2080] Federally Enforceable Through Title V Permit
21. Prior to opening the FWKO to allow FWKO cleaning one of the following options must be followed: 1) operate the vapor control system for at least 24 hours after all the liquid in the FWKO has been drained to the maximum extent feasible, 2) displace vapors floating the oil pad off with water such that 90% of the FWKO liquid capacity is displaced, 3) vent the FWKO to the vapor control system until the vapor concentration is less than 10% of the lower explosive limit (LEL) or 5,000 ppmv whichever is less; or 4) vent the FWKO to the vapor control system for a length of time determined by the following relationship:  $t = 2.3 V/Q$ , where  $t$  = time,  $V$  = FWKO volume (cubic feet), and  $Q$  = flow rate to the vapor control system as determined using appropriate engineering calculations. [District Rule 2080] Federally Enforceable Through Title V Permit
22. The FWKO shall be cleaned using water, hot water, solvents with an initial boiling point of greater than 302 F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams VOC per liter or less. Sediment may be used for road mix as allowed by Section 6.17 of District Rule 2020. [District Rule 2080] Federally Enforceable Through Title V Permit
23. Steam cleaning shall be allowed only during December through March, or at locations where wastewater treatment facilities are limited. [District Rule 2080] Federally Enforceable Through Title V Permit
24. Prior to reintroducing crude oil/water to the FWKO, the FWKO unit shall be filled to the maximum possible level with water or an organic liquid with a TVP less than 0.5 psia, the vessel vapor control system shall be reactivated, and the liquid level shall be adjusted as necessary. Pressure/relief valve shall not open during filling of the FWKO. [District Rule 2080] Federally Enforceable Through Title V Permit
25. Within 48 hours after refilling the FWKO with crude oil/water, the pressure relief valve seats and hatch seals shall be inspected for leaks using EPA method 21 and the regular vessel maintenance and inspection program shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
26. All records shall be maintained and retained on the premises for a period of at least five years and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

**APPENDIX B**  
**Compliance Certification**

San Joaquin Valley  
Unified Air Pollution Control District

RECEIVED  
JUN 19 2014  
SJVAPCD  
Southern Region

TITLE V COMPLIANCE CERTIFICATION FORM

Tank cleaning and notification revisions

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION       ADMINISTRATIVE  
 MINOR PERMIT MODIFICATION               AMENDMENT

COMPANY NAME: Aera Energy LLC	FACILITY ID: S-1548 <sup>5-13-14</sup>
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: Aera Energy LLC	
3. Agent to the Owner: N/A	

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

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

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

  
\_\_\_\_\_  
Signature of Responsible Official

6-18-14  
\_\_\_\_\_  
Date

Adrian Vega  
\_\_\_\_\_  
Name of Responsible Official (please print)

Process Supervisor  
\_\_\_\_\_  
Title of Responsible Official (please print)

**APPENDIX C**  
**Draft ATC's**

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** S-1547-888-18

**LEGAL OWNER OR OPERATOR:** AERA ENERGY LLC  
**MAILING ADDRESS:** PO BOX 11164  
BAKERSFIELD, CA 93389-1164

**LOCATION:** HEAVY OIL WESTERN STATIONARY SOURCE  
KERN COUNTY, CA

**SECTION:** SW2 **TOWNSHIP:** 29S **RANGE:** 21E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 7500 BBL (315,000 GALLON) FIXED ROOF CRUDE OIL STORAGE TANK F-4304 VENTED TO SHARED VAPOR CONTROL SYSTEM WITH COMPRESSOR(S), PUMP(S), COOLER(S) LIQUID KNOCKOUT(S), PRESSURE VESSEL(S), PIPING TO S-1547-359, AND PIPING TO THE SECTION 32 GAS PLANT (FACILITY S-1543):REVISE TANK CLEANING NOTIFICATION REQUIREMENT

**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. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rules 2080 and 4623] Federally Enforceable Through Title V Permit
4. Permittee shall conduct tank cleaning and maintenance operations in accordance with District approved procedure as described in this permit. [District Rules 2080 and 4623] Federally Enforceable Through Title V Permit
5. Tank may be disconnected from vapor control system during District approved cleaning and maintenance procedures as described in this permit. [District Rules 2080 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

**Arnaud Marjolle, Director of Permit Services**  
S-1547-888-18 : Nov 10 2014 11:57AM - KLEVANNND : Joint Inspection NOT Required

6. 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 2080 and 4623] Federally Enforceable Through Title V Permit
7. Prior to opening the tank to allow tank cleaning one of the following procedures must be followed: 1) operate the vapor recovery system for at least 24 hours after all the liquid in the tank has been drained, 2) displace vapors floating the oil pad off with water such that 90% of the tank volume is displaced, 3) vent the tank to the vapor control system until the vapor concentration is less than 10% of the lower explosive limit (LEL) or 5,000 ppmv whichever is less; or 4) vent the tank to the vapor control system for a length of time determined by the following relationship:  $t = 2.3 V / Q$ , where  $t$  = time,  $V$  = tank volume (cubic feet), and  $Q$  = flow rate to the vapor control system as determined using appropriate engineering calculations. [District Rules 2080 and 4623] Federally Enforceable Through Title V Permit
8. The tank shall be cleaned using one of the following methods: water, hot water, solvents with an initial boiling point of greater than 302 F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams VOC per liter or less. The tank sediment shall be used for road mix as allowed by Section 6.17 of District Rule 2020. [District Rules 2080 and 4623] Federally Enforceable Through Title V Permit
9. Steam cleaning shall be allowed only during December through March, or at locations where wastewater treatment facilities are limited. [District Rules 2080 and 4623] Federally Enforceable Through Title V Permit
10. Prior to reintroducing crude oil/water to the tank, the vapor recovery system shall be operational. The tank may be filled with water to minimize the tank headspace prior to restarting the vapor recovery system. [District Rules 2080 and 4623] Federally Enforceable Through Title V Permit
11. Within 48 hours after refilling the tank with crude oil/water, the pressure relief valve seats and hatch seals shall be inspected for leaks using EPA method 21 and the regular tank maintenance and inspection program shall resume. [District Rules 2080 and 4623] Federally Enforceable Through Title V Permit
12. Permittee shall maintain records of each period of cleaning and maintenance when the tank is disconnected or isolated from the vapor control system. Records shall include the date that tank cleaning was initiated, the date tank cleaning was completed, the method of tank cleaning used, and a description of internal and external tank repairs and maintenance performed. Such records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2080 and 4623] Federally Enforceable Through Title V Permit
13. The following Dehy 2 permit units shall be tied into the shared vapor recovery system, TEOR S-1547-359: '-888 , '-889, '-890, '-891, '-892, '-893, '-894, '-895, '-896, '-897, '-898, '-899, '-902, '-903, '-904, '-905, '-906, '-944, '-945, '-946, '-947, '-948, '-949, '-950, '-951, '-1014, '-1015, '-1019, '-1116, '-1117, '-1119, '-1123, and '-1124. [District Rule 2201] Federally Enforceable Through Title V Permit
14. This vapor recovery system is authorized to receive recovered gas from the Anderson/Fitzgerald Dehydration facility including units S-1547-378, '-379, '-380, '-383, '-407, '-408, '-410, '-411, '-704, '-1100, '-1101, '-1102, '-1106, '-1115, and '-1121. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Drain valves shall only drain into covered containers which shall be emptied into tanks with vapor control system. [District Rule 2201] Federally Enforceable Through Title V Permit
16. VOC fugitive emissions from this tank and tank vapor control system including vapor control system trunk line prior to intertie with TEOR S-1547-359 shall not exceed 96.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Permittee shall maintain with the permit accurate fugitive component counts for tank and tank vapor control system, including vapor control system trunk line, according to Table 2-4 (Oil and Gas Production Operations Average Emission Factors) of USEPA's protocol for Equipment Emission Estimates - EPA -453/R-95-017. [District Rule 2201]
18. The tank shall be equipped with a fixed roof with no holes or openings. [District Rule 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

19. The operator shall keep accurate records of types, storage temperature and true vapor pressure of liquids stored. [District Rule 4623] Federally Enforceable Through Title V Permit
20. 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. Collected vapors shall be directed to approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in Section 6.4.7. [District Rules 2201 & 4623, 5.6.1] Federally Enforceable Through Title V Permit
21. All tank seams, joints, piping, valves and fittings shall be constructed and maintained in a leak-free condition except during interior tank cleaning. [District Rule 4623, 5.6.3] Federally Enforceable Through Title V Permit
22. 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 ppmv, above background, as measured by a portable hydrocarbon detection instrument 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 Rule 4623, 3.11, 3.17 and 3.18] Federally Enforceable Through Title V Permit
23. Except as otherwise provided in this permit, 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, 3.9 and 6.4.8] Federally Enforceable Through Title V Permit
24. 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
25. 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 Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
26. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
27. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) Eliminate or minimize the leak within 8 hours after detection. (b) If the leak can not 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 detection. (c) In no event that the total time to minimize and eliminate the leak shall exceed 56 hours after detection. [District Rule 4623, 5.7 9 (Table 3)] Federally Enforceable Through Title V Permit
28. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit or District Rule 4623. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of SJVUAPCD Rule 4623. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
29. If a component type for a given tank is found to leak during an annual inspection, then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, then revert to annual inspections. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
30. Any component found to be leaking on two consecutive annual inspections is in violation of SJVUAPCD Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
31. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

32. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
33. The control efficiency of the VOC construction device, measured and calculated as carbon, shall be determined by US EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case US EPA Method 25a may be used. US EPA Method 18 may be used in lieu of US EPA Method 25 or US EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of the known analytes/compounds to ensure that the VOC concentrations are neither under-reported or over-reported. Analysis of halogenated exempt compounds shall be analyzed by ARB Method 422 "Exempt Halogenated VOCs in Gases September 12, 1990". [District Rule 4623, 6.4.6, 6.4.7] Federally Enforceable Through Title V Permit
34. The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times and shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
35. {2591} The operator of a fixed roof tank shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
36. Note: Formerly S-1511-398.

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE: DRAFT**  
**DRAFT**

**PERMIT NO:** S-1547-1115-5

**LEGAL OWNER OR OPERATOR:** AERA ENERGY LLC  
**MAILING ADDRESS:** PO BOX 11164  
BAKERSFIELD, CA 93389-1164

**LOCATION:** HEAVY OIL WESTERN STATIONARY SOURCE  
KERN COUNTY, CA

**SECTION:** SE 26 **TOWNSHIP:** 29S **RANGE:** 21E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 25,900 GALLON INDUCED STATIC FLOTATION CELL VENTED TO SHARED VAPOR CONTROL SYSTEM LISTED ON S-1547-704 (A/F DEHY):REVISE TANK CLEANING NOTIFICATION REQUIREMENT

**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. Tank gauging or sampling devices shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All piping valves and fittings shall be constructed and maintained in a gas tight condition. 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. [District Rule 2201] Federally Enforceable Through Title V Permit
5. VOC emission rate from vapor control components associated with this emissions unit shall not exceed 10.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director APCO

**Arnaud Marjolle, Director of Permit Services**  
S-1547-1115-5 : Nov 10 2014 11:57AM -- KLEVANNND : Joint Inspection NOT Required

6. The true vapor pressure (TVP) of any liquid placed, stored or held in the tank shall be less than 0.5 psia at storage temperature. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Permittee shall maintain an accurate fugitive component count and resultant emissions calculated using emission factors from U.S. EPA Publication 453/R-95-017, or other District approved factors. [District Rule 2201] 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 and shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
9. All piping, fittings, and valves directly affixed to the tank or associated with the tank vapor recovery system 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 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Emissions from components which have been tagged by the facility operator for repair within 15 calendar days or which have been repaired and are awaiting re-inspection shall not be in violation of this permit. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
13. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
14. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
15. 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 2520, 9.4.2] Federally Enforceable Through Title V Permit
16. This permit authorizes induced static flotation unit cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2080] Federally Enforceable Through Title V Permit

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17. Permittee shall conduct induced static flotation unit cleaning and maintenance operations in accordance with District approved procedure as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
18. Induced static flotation unit may be disconnected from vapor control system during District approved cleaning and maintenance procedures as described in this permit. [District Rule 2080] 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 Rule 2080 and 4623] Federally Enforceable Through Title V Permit
20. Prior to opening the induced static flotation unit to allow cleaning the following procedures must be followed: Operate PV valve and vapor recovery system (if equipped) during emptying, filling, and flushing. During filling and purging, no vapor leakage is allowed. Drain all liquid from the induced static flotation unit to the maximum extent feasible prior to opening the induced static flotation unit. [District Rule 2080] Federally Enforceable Through Title V Permit
21. Prior to opening the induced static flotation unit to allow tank cleaning one of the following options must be followed: 1) operate the vapor recovery system for at least 24 hours after all the liquid in the induced static flotation unit has been drained to the maximum extent feasible, 2) displace vapors floating the oil pad off with water such that 90% of the induced static flotation unit liquid capacity is displaced, 3) vent the induced static flotation unit to the vapor control system until the vapor concentration is less than 10% of the lower explosive limit (LEL) or 5,000 ppmv whichever is less; or 4) vent the induced static flotation unit to the vapor control system for a length of time determined by the following relationship:  $t = 2.3 V/Q$ , where  $t$  = time,  $V$  = induced static flotation unit volume (cubic feet), and  $Q$  = flow rate to the vapor control system as determined using appropriate engineering calculations. [District Rule 2080] Federally Enforceable Through Title V Permit
22. The induced static flotation unit shall be cleaned using water, hot water, solvents with an initial boiling point of greater than 302 F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams VOC per liter or less. Sediment may be used for road mix as allowed by Section 6.17 of District Rule 2020. [District Rule 2080] Federally Enforceable Through Title V Permit
23. Steam cleaning shall be allowed only during December through March, or at locations where wastewater treatment facilities are limited. [District Rule 2080] Federally Enforceable Through Title V Permit
24. Prior to reintroducing crude oil/water to the induced static flotation unit, the induced static flotation unit shall be filled to the maximum possible level with water or an organic liquid with a TVP less than 0.5 psia, the tank vapor control system shall be reactivated, and the liquid level shall be adjusted as necessary. Pressure/relief valve shall not open during filling of the induced static flotation unit. [District Rule 2080] Federally Enforceable Through Title V Permit
25. Within 48 hours after refilling the induced static flotation unit with crude oil/water, the pressure relief valve seats and hatch seals shall be inspected for leaks using EPA method 21 and the regular tank maintenance and inspection program shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
26. Permittee shall maintain records of each period of cleaning and maintenance when the induced static flotation unit is disconnected or isolated from the vapor control system. Records shall include the date that induced static flotation unit cleaning was initiated, the date induced static flotation unit cleaning was completed, the method of induced static flotation unit cleaning used, and a description of internal and external induced static flotation unit repairs and maintenance performed. Such records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit
27. All records shall be maintained and retained on the premises for a period of at least five years and made available for District inspection upon request. [District Rule 1070] 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-1547-1123-2

**LEGAL OWNER OR OPERATOR:** AERA ENERGY LLC  
**MAILING ADDRESS:** PO BOX 11164  
BAKERSFIELD, CA 93389-1164

**LOCATION:** HEAVY OIL WESTERN STATIONARY SOURCE  
KERN COUNTY, CA

**SECTION:** SW2 **TOWNSHIP:** 29S **RANGE:** 21E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 12 FT DIA X 65 FT SHELL LENGTH 55,000 GALLON FREE WATER KNOCKOUT VESSEL VENTED TO SHARED VAPOR CONTROL SYSTEM LISTED ON S-1547-888 (DEHY 2): REVISE TANK CLEANING NOTIFICATION REQUIREMENT

**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. FWKO shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from FWKO and a VOC control device. The vessel and APCO-approved vapor control system, including piping, valves, and fittings, shall be maintained in a gas tight condition. [District Rule 2201] Federally Enforceable Through Title V Permit
4. FWKO shall be designed and maintained to vent only to vapor control system S-1547-888 and an operational flow check valve shall be operational (except during times when vapor control system line is closed) downstream of the FWKO dome gas separator. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director, APCO

**Arnaud Marjollet, Director of Permit Services**  
S-1547-1123-2, Nov 10 2014 11:57AM - KLEVANNND : Joint Inspection NOT Required

5. The operator shall ensure that the vapor control system is functional and is operating as designed at all times and shall monitor vapor control compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. VOC emission rate from vapor control components associated with this emissions unit shall not exceed 13.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Permittee shall maintain an accurate fugitive component count and resultant emissions calculated using emission factors from U.S. EPA Publication 453/R-95-017, or other District approved factors. [District Rule 2201] Federally Enforceable Through Title V Permit
8. 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. [District Rule 2520] Federally Enforceable Through Title V Permit
9. Except as otherwise provided in this permit, a reading in excess of 10,000 ppmv above background is a violation of this permit and shall be reported as a deviation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Any FWKO gauging or sampling device shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 2201] Federally Enforceable Through Title V Permit
11. All piping, fittings, and valves directly affixed to the FWKO or associated with the FWKO vapor control system 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 FWKO 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 FWKO 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 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. Emissions from components which have been tagged by the facility operator for repair within 15 calendar days or which have been repaired and are awaiting re-inspection shall not be in violation of this permit. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

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22. Prior to opening the FWKO to allow cleaning the following procedures must be followed: Operate PV valve and vapor control system (if equipped) during emptying, filling, and flushing. During filling and purging, no vapor leakage is allowed. Drain all liquid from the FWKO to the maximum extent feasible prior to opening the FWKO. [District Rule 2080] Federally Enforceable Through Title V Permit
23. Prior to opening the FWKO to allow FWKO cleaning one of the following options must be followed: 1) operate the vapor control system for at least 24 hours after all the liquid in the FWKO has been drained to the maximum extent feasible, 2) displace vapors floating the oil pad off with water such that 90% of the FWKO liquid capacity is displaced, 3) vent the FWKO to the vapor control system until the vapor concentration is less than 10% of the lower explosive limit (LEL) or 5,000 ppmv whichever is less; or 4) vent the FWKO to the vapor control system for a length of time determined by the following relationship:  $t = 2.3 V/Q$ , where  $t$  = time,  $V$  = FWKO volume (cubic feet), and  $Q$  = flow rate to the vapor control system as determined using appropriate engineering calculations . [District Rule 2080] Federally Enforceable Through Title V Permit
24. The FWKO shall be cleaned using water, hot water, solvents with an initial boiling point of greater than 302 F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams VOC per liter or less. Sediment may be used for road mix as allowed by Section 6.17 of District Rule 2020. [District Rule 2080] Federally Enforceable Through Title V Permit
25. Steam cleaning shall be allowed only during December through March, or at locations where wastewater treatment facilities are limited. [District Rule 2080] Federally Enforceable Through Title V Permit
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27. Within 48 hours after refilling the FWKO with crude oil/water, the pressure relief valve seats and hatch seals shall be inspected for leaks using EPA method 21 and the regular vessel maintenance and inspection program shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
28. All records shall be maintained and retained on the premises for a period of at least five years and made available for District inspection upon request. [District Rule 1070] 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-1547-1124-2

**LEGAL OWNER OR OPERATOR:** AERA ENERGY LLC  
**MAILING ADDRESS:** PO BOX 11164  
BAKERSFIELD, CA 93389-1164

**LOCATION:** HEAVY OIL WESTERN STATIONARY SOURCE  
KERN COUNTY, CA

**SECTION:** SW2 **TOWNSHIP:** 29S **RANGE:** 21E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 12 FT DIA X 65 FT SHELL LENGTH 55,000 GALLON FREE WATER KNOCKOUT VESSEL VENTED TO SHARED VAPOR CONTROL SYSTEM LISTED ON S-1547-888 (DEHY 2): REVISE TANK CLEANING NOTIFICATION REQUIREMENT

**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. FWKO shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from FWKO and a VOC control device. The vessel and APCO-approved vapor control system, including piping, valves, and fittings, shall be maintained in a gas tight condition. [District Rule 2201] Federally Enforceable Through Title V Permit
4. FWKO shall be designed and maintained to vent only to vapor control system S-1547-888 and an operational flow check valve shall be operational (except during times when vapor control system line is closed) downstream of the FWKO dome gas separator. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director, APCO

**Arnaud Marjollet, Director of Permit Services**  
S-1547-1124-2, Nov 10 2014 11:57AM -- KLEVANNND : Joint Inspection NOT Required

5. The operator shall ensure that the vapor control system is functional and is operating as designed at all times and shall monitor vapor control compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. VOC emission rate from vapor control components associated with this emissions unit shall not exceed 13.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Permittee shall maintain an accurate fugitive component count and resultant emissions calculated using emission factors from U.S. EPA Publication 453/R-95-017, or other District approved factors. [District Rule 2201] Federally Enforceable Through Title V Permit
8. 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. [District Rule 2520] Federally Enforceable Through Title V Permit
9. Except as otherwise provided in this permit, a reading in excess of 10,000 ppmv above background is a violation of this permit and shall be reported as a deviation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Any FWKO gauging or sampling device shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 2201] Federally Enforceable Through Title V Permit
11. All piping, fittings, and valves directly affixed to the FWKO or associated with the FWKO vapor control system 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 FWKO 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 FWKO 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 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. Emissions from components which have been tagged by the facility operator for repair within 15 calendar days or which have been repaired and are awaiting re-inspection shall not be in violation of this permit. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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