



**MAY 26 2015**

Mr. Robert Beebout  
Aera Energy LLC  
PO Box 11164  
Bakersfield, CA 93389

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)  
District Facility # S-1135  
Project # 1150633**

Dear Mr. Beebout:

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 Authorities to Construct are to authorize five W&S/Maxwell Dehy storage tanks to receive crude oil production from the Vedder lease and to authorize Vedder wells to be included in TEOR operation S-1135-124's well count.

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.

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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

**Central Region (Main Office)**  
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Bakersfield, CA 93308-9725  
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Mr. Robert Beebout  
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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

**San Joaquin Valley Air Pollution Control District**  
**Authority to Construct Application Review**  
**Fixed Roof Oil Field Production Tanks and TEOR Operation**

Facility Name: Aera Energy LLC  
Mailing Address: PO Box 11164  
Bakersfield, CA 93389  
Contact Person: Robert Beebout  
Telephone: (661) 665-3212  
Application #(s): S-1135-124-17, '173-23, '174-10, '175-9, '178-11, '325-3 and '337-3  
Project #: 1150633  
Deemed Complete: 3/13/15

Date: 4/24/15  
Engineer: David Torii  
Lead Engineer: Rich Karrs

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## **I. Proposal**

Aera Energy LLC (Aera) requests Authority to Construct (ATC) permits to authorize six W&S storage tanks to receive Vedder lease production.

Aera also requests revision to Exeter TEOR permit S-1135-124 to include future wells to be drilled at Vedder. Aera is not proposing to increase S-1135-124's well count or change its equipment or emissions; the revision will only add "Vedder" as a location of its wells.

Aera also requests that the words "or incinerating steam generators" be removed from '124's Equipment Description. This wording was removed via implemented ATC S-124-12 in project S950611. The ATC was issued before the facility received their Initial Title V permit; however, the Equipment Description's revised wording wasn't carried over to the Title V permit or to subsequent modifications of the permit. Therefore, this change will be administratively made in this project.

Aera received their Title V Permit on 8/31/02. 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) <i>This rule applies to attainment pollutants only. The subject equipment only emits VOC. VOC is not an attainment pollutant; therefore, this rule does not apply.</i> |
| Rule 2520 | Federally Mandated Operating Permits (6/21/01)   |
| Rule 4001 | New Source Performance Standards (4/14/99)   |
| Rule 4101 | Visible Emissions (2/17/05)  |
| Rule 4102 | Nuisance (12/17/92)  |

Rule 4401 Steam Enhanced Crude Oil Production Well Vents (6/16/11)  
Rule 4623 Storage of Organic Liquids (05/19/05)  
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 Vedder lease is located within Section 9, Township 31S, Range 22E. The W&S/Maxwell Dehy is located within Section 14, Township 31S, Range 22E. Both locations are in Aera's Heavy Oil Western stationary source. 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

Aera operates permitted equipment within their Heavy Oil Western stationary source utilized for thermally enhanced production of crude oil and natural gas. In thermally enhanced oil recovery (TEOR), natural gas is combusted in steam generators to produce steam for injection into heavy crude oil bearing strata via injection wells to reduce viscosity of the crude oil, thereby facilitating thermally enhanced oil production.

The tanks and vessels at the tank battery receive production prior to custody transfer. VOC emissions from the tanks are controlled by a shared vapor control system.

### V. Equipment Listing

Pre-Project Equipment Description (see PTOs in Appendix A):

- S-1135-124-16: THERMALLY ENHANCED OIL RECOVERY (TEOR) OPERATION SERVING 254 STEAM ENHANCED WELLS, AND TIED TO TEOR '293 INCLUDING PIPING TO BALANCED CGCS, RE-INJECTION COMPRESSORS OR INCINERATING STEAM GENERATORS (EXETER LEASE)
- S-1135-173-22: 1,600 BBL (67,200 GALLON) FIXED ROOF LACT TANK ID# WS-01, HANDLING MAXWELL LEASE PRODUCTION, AND VESSELS V-101, V-102, V-103, AND V-104; WITH VAPOR CONTROL SYSTEM SHARED WITH TANKS S-1135-174, -175, -178, -325, AND -337 (W&S LEASE) DISCHARGING TO TEOR WVVCS S-1135-125
- S-1135-174-9: 2,000 BBL (84,000 GALLON) FIXED ROOF WASH TANK ID# WS-02, HANDLING MAXWELL LEASE PRODUCTION, CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON S-1135-173 (W&S LEASE)
- S-1135-175-8: 1,600 BBL (67,200 GALLON) FIXED ROOF LACT TANK ID# WS-03, HANDLING MAXWELL LEASE PRODUCTION, CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON S-1135-173 (W&S LEASE)

- S-1135-178-10: 3,000 BBL (126,000 GALLON) FIXED ROOF SUMP PROCESS TANK ID# WS-06, HANDLING MAXWELL LEASE PRODUCTION, CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON S-1135-173 (W&S LEASE)
- S-1135-325-2: 3,000 BBL FIXED ROOF CRUDE OIL STORAGE TANK, HANDLING MAXWELL LEASE PRODUCTION, SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-1135-173 (W & S LEASE)
- S-1135-337-2: 3,000 BBL (126,000 GALLON) FIXED ROOF STOCK TANK ID# WS-04, HANDLING MAXWELL LEASE PRODUCTION, CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON S-1135-173 (W&S LEASE)

Proposed Modification:

- S-1135-124-17: MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY (TEOR) OPERATION SERVING 254 STEAM ENHANCED WELLS, AND TIED TO TEOR '293 INCLUDING PIPING TO BALANCED CGCS, RE-INJECTION COMPRESSORS OR INCINERATING STEAM GENERATORS (EXETER LEASE): **INCLUDE VEDDER LEASE WELLS IN WELL COUNT AND REMOVE " OR INCINERATING STEAM GENERATORS" FROM EQUIPMENT DESCRIPTION**
- S-1135-173-23: MODIFICATION OF 1,600 BBL (67,200 GALLON) FIXED ROOF LACT TANK ID# WS-01, AND VESSELS V-101, V-102, V-103, AND V-104; WITH VAPOR CONTROL SYSTEM SHARED WITH TANKS S-1135-174, -175, -178, -325, AND -337 (W&S LEASE) DISCHARGING TO TEOR WVCS S-1135-125: **AUTHORIZE RECEIPT OF VEDDER LEASE PRODUCTION**
- S-1135-174-10: MODIFICATION OF 2,000 BBL (84,000 GALLON) FIXED ROOF WASH TANK ID# WS-02, CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON S-1135-173 (W&S LEASE): **AUTHORIZE RECEIPT OF VEDDER LEASE PRODUCTION**
- S-1135-175-9: MODIFICATION OF 1,600 BBL (67,200 GALLON) FIXED ROOF LACT TANK ID# WS-03, CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON S-1135-173 (W&S LEASE): **AUTHORIZE RECEIPT OF VEDDER LEASE PRODUCTION**
- S-1135-178-11: MODIFICATION OF 3,000 BBL (126,000 GALLON) FIXED ROOF SUMP PROCESS TANK ID# WS-06, CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON S-1135-173 (W&S LEASE): **AUTHORIZE RECEIPT OF VEDDER LEASE PRODUCTION**
- S-1135-325-3: MODIFICATION OF 3,000 BBL FIXED ROOF CRUDE OIL STORAGE TANK, SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-1135-173 (W & S LEASE): **AUTHORIZE RECEIPT OF VEDDER LEASE PRODUCTION**

S-1135-337-3: MODIFICATION OF 3,000 BBL (126,000 GALLON) FIXED ROOF STOCK TANK ID# WS-04, CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON S-1135-173 (W&S LEASE): **AUTHORIZE RECEIPT OF VEDDER LEASE PRODUCTION**

Post Project Equipment Description:

- S-1135-124-17: THERMALLY ENHANCED OIL RECOVERY (TEOR) OPERATION SERVING 254 STEAM ENHANCED WELLS, AND TIED TO TEOR '293 INCLUDING PIPING TO BALANCED CGCS, RE-INJECTION COMPRESSORS OR INCINERATING STEAM GENERATORS (EXETER **AND VEDDER** LEASES)
- S-1135-173-23: 1,600 BBL (67,200 GALLON) FIXED ROOF LACT TANK ID# WS-01, AND VESSELS V-101, V-102, V-103, AND V-104; WITH VAPOR CONTROL SYSTEM SHARED WITH TANKS S-1135-174, -175, -178, -325, AND -337 (W&S LEASE) DISCHARGING TO TEOR WVCSS S-1135-125
- S-1135-174-10: 2,000 BBL (84,000 GALLON) FIXED ROOF WASH TANK ID# WS-02, CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON S-1135-173 (W&S LEASE)
- S-1135-175-9: 1,600 BBL (67,200 GALLON) FIXED ROOF LACT TANK ID# WS-03, CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON S-1135-173 (W&S LEASE)
- S-1135-178-11: 3,000 BBL (126,000 GALLON) FIXED ROOF SUMP PROCESS TANK ID# WS-06, CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON S-1135-173 (W&S LEASE)
- S-1135-325-3: 3,000 BBL FIXED ROOF CRUDE OIL STORAGE TANK, SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-1135-173 (W & S LEASE)
- S-1135-337-3: 3,000 BBL (126,000 GALLON) FIXED ROOF STOCK TANK ID# WS-04, CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON S-1135-173 (W&S LEASE)

## VI. Emission Control Technology Evaluation

The tanks and TEOR operation are served by a vapor control system which collects vapors from the tanks and TEOR operation, removes entrained liquid in knockout vessels and scrubber vessels, condenses vapors in heat exchangers, A vapor control system collects vapors from the tanks and TEOR operation and routes the uncondensed vapors to a vapor control system that reduces inlet VOC emissions by at least 99% by weight.

## VII. General Calculations

### A. Assumptions

Authorizing the subject tanks to receive production from another well development is not an NSR modification since the tanks have vapor control. No emission increase is expected. As shown below in section VIII, including new Vedder wells in TEOR S-1135-124's well count is not an NSR modification.

Consequently, as this project is not an NSR modification, calculations are not required.

## VIII. Compliance

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

This rule applies to all new stationary sources and all *modifications* to existing stationary sources which are subject to the District permit requirements and after construction emit or may emit one or more affected pollutant.

A Modification is:

An action including at least one of the following items:

- Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.
- Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.
- An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.
- Addition of any new emissions unit which is subject to District permitting requirements.
- A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

Including new Vedder wells in TEOR S-1135-124's well count is not a *modification* and the stationary source is not new; therefore, the revision to '124 is not an NSR modification and further NRS discussion regarding ATC S-1135-124-17 is required.

### Rule 2520 Federally Mandated Operating Permits

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

In accordance with Rule 2520, these modifications:

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

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

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

This rule incorporates NSPS from Part 60, Chapter 1, Title 40, Code of Federal Regulations (CFR); and applies to all new sources of air pollution and modifications of existing sources of air pollution listed in 40 CFR Part 60. However, no subparts of 40 CFR Part 60 apply to TEOR operations.

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

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

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

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

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

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

As long as the equipment is properly maintained and operated, compliance with visible emissions limits is expected under normal operating conditions.

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

The affected tanks are served by a vapor control system that has a control efficiency of at least 99%. This rule also requires the tank and tank vapor control system to be maintained in a leak-free condition. Leak-free is defined in the rule as no readings on a portable VOC detection device greater than 10,000 ppmv above background and no dripping of organic liquid at a rate of more than 3 drops per minute.

Compliance with the requirements of this rule is expected.

#### **Rule 4401 Steam Enhanced Crude Oil Production Well Vents**

The purpose of this rule is to limit the VOC emissions from steam-enhanced crude oil production well vents. This rule is applicable to all steam-enhanced crude oil production wells and any associated vapor collection and control systems.

TEOR permit S-1135-124 currently includes conditions ensuring compliance with this rule which will also apply to future Vedder wells. Compliance is expected.

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

This project will not result in an increase in emissions; 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. Pending a successful EPA Noticing period, issue ATCs S-1135-124-17, '173-23, '174-10, '175-9, '178-11, '325-3 and '337-3 subject to the permit conditions on the attached draft ATCs in **Appendix B**.

**X. Billing Information**

| <b>Annual Permit Fees</b> |                     |                        |                   |
|---------------------------|---------------------|------------------------|-------------------|
| <b>Permit Number</b>      | <b>Fee Schedule</b> | <b>Fee Description</b> | <b>Annual Fee</b> |
| S-1135-124-17             | 3020-09A            | 254 wells              | \$2372.36         |
| S-1135-173-23             | 3020-05D            | 67,200 gallons         | \$185.00          |
| S-1135-174-10             | 3020-05D            | 84,000 gallons         | \$185.00          |
| S-1135-175-19             | 3020-05D            | 67,200 gallons         | \$185.00          |
| S-1135-178-11             | 3020-05E            | 126,000 gallons        | \$246.00          |
| S-1135-325-3              | 3020-05E            | 126,000 gallons        | \$246.00          |
| S-1135-337-3              | 3020-05E            | 126,000 gallons        | \$246.00          |

**Appendixes**

- A: Current PTOs
- B: Draft ATC

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1135-124-16

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

**SECTION:** NW15 **TOWNSHIP:** 31S **RANGE:** 22E

**EQUIPMENT DESCRIPTION:**

THERMALLY ENHANCED OIL RECOVERY (TEOR) OPERATION SERVING 254 STEAM ENHANCED WELLS, AND TIED TO TEOR '293 INCLUDING PIPING TO BALANCED CGCS, RE-INJECTION COMPRESSORS OR INCINERATING STEAM GENERATORS (EXETER LEASE)

## PERMIT UNIT REQUIREMENTS

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1. Well vent vapor control system VOC fugitive emission rate shall not exceed 50.8 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Permittee shall maintain with the permit accurate fugitive component counts for well vent vapor control system and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999) Oil and Gas Production, Screening Value Range emission factors. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
4. Compliance with permit conditions in the Title V permit shall be deemed compliance with SJVUAPCD Rule 4401 (Amended January 15, 1998), excluding sections 5.1 and 5.2 for control systems which have been waived from complying with the requirement of section 6.2.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
5. The crude oil production wells associated with this unit do not have production enhanced by in-situ combustion. Therefore, the requirements of SJVUAPCD Rule 4407 (Adopted May 19, 1994) do not apply to this permit unit. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
6. Operation shall include noncondensable vapor piping from vapor control skids to balanced system and re-injection compressors. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Operation shall include vapor control skids including: various size knockout vessels with liquid pumps, gas scrubbers, heat exchangers, vapor compressors, and piping to District approved disposal devices. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Piping to re-injection system shall include re-injection knock out vessels, interstage coolers & gas/liquid separators, injection gas compressors and liquid transfer pumps, as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
9. TEOR gas injected into formation shall only be performed using DOG approved injection wells. [District Rule 2080] Federally Enforceable Through Title V Permit
10. Permittee shall cease injecting vapors and notify the District immediately if DOG injection approval is revoked, denied, terminated, surrendered or altered to disallow injection. [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.

11. A listing of all steam enhanced wells connected to this system shall be maintained onsite and readily available to the District upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Vapor collection piping TEORs S-1135-124 and '1-293 shall be contained in a balanced CGCS or collected at VR skid(s) and piped to approved injection wells. [District Rule 2201] Federally Enforceable Through Title V Permit
13. TEOR gas not re-injected to the formation shall be contained within balanced casing vent collection system, or well casing vents shall be closed and produced fluids handled only in controlled production equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Records shall be kept of injection well(s) utilized and volume of vapors injected. Records shall be made readily available to the District upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
15. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the requirements of District Rule 4401. [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
16. The fugitive emissions component inspection and reinspection requirements of Section 5.4.1 through Section 5.4.7 of this rule shall not apply to components exclusively handling gas/vapor or liquid with a VOC content of ten percent by weight or less (≤10 wt.%), as determined by the test methods in Section 6.3.4. [District Rule 4401] Federally Enforceable Through Title V Permit
17. The uncontrolled VOC emissions from any well vent shall be reduced by at least 99 percent by weight or, if several steam-enhanced crude oil production well vents are connected to a vapor collection and control system, total uncontrolled VOC emissions shall be reduced by at least 99 percent. [District Rule 4401, 5.1 and 5.2] Federally Enforceable Through Title V Permit
18. An operator shall not operate a steam-enhanced crude oil production well unless either of the following two conditions are met: 1) The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids is connected to a VOC collection and control system as defined in Section 3.0 of this Rule or 2) the steam-enhanced crude oil production well vent is open and the well vent is connected to a VOC collection and control system as defined in Section 3.0. [District Rule 4401, 5.5.1 and 5.5.2] Federally Enforceable Through Title V Permit
19. There shall be no open-ended line or a valve located at the end of the line that is not sealed with a blind flange, plug, cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended lines. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401, 5.2.2.1] Federally Enforceable Through Title V Permit
20. There shall be no components with a major liquid leak as defined in Section 3.20.2 of Rule 4401. [District Rule 4401, 5.2.2.2] Federally Enforceable Through Title V Permit
21. There shall be no components with a gas leak of greater than 50,000 ppmv. [District Rule 4401, 5.2.2.3] Federally Enforceable Through Title V Permit
22. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of any combination of components with minor liquid leaks, minor gas leaks, or gas leaks greater than 10,000 ppmv up to 50,000 ppmv that totals more than number of leaks allowed by Table 2 of Rule 4401. [District Rule 4401, 5.2] Federally Enforceable Through Title V Permit
23. No leaking components (as defined in Section 5.2.2 of Rule 4401) may be used unless they have been identified with a tag for repair, are repaired, or awaiting re-inspection after being repaired within the applicable time frame specified in Section 5.5. [District Rule 4401, 5.7.1] Federally Enforceable Through Title V Permit
24. Each hatch shall be closed at all times except during attended repair, replacement, or maintenance operations, providing such activities are done as expeditiously as possible with minimal spillage or material and VOC emissions into the atmosphere. [District Rule 4401, 5.3.2] 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.

25. The operator shall comply with the requirements of Section 6.7 if there is any change in the description of major components or critical components. [District Rule 4401, 5.3.3] Federally Enforceable Through Title V Permit
26. Unless otherwise specified in Section 5.4, an operator shall perform all component inspections and gas leak measurements pursuant to the requirements of Section 6.3.3. [District Rule 4401, 5.4] Federally Enforceable Through Title V Permit
27. Except for pipes and unsafe-to-monitor components, an operator shall inspect all other components pursuant to the requirements of Section 6.3.3 at least once every year. [District Rule 4401, 5.4.1] Federally Enforceable Through Title V Permit
28. An operator shall visually inspect all pipes at least once every year. Any visual inspection of pipes that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected within 24 hours after detecting the leak. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 3 of this Rule. [District Rule 4401, 5.4.2] Federally Enforceable Through Title V Permit
29. An operator shall inspect for leaks all accessible operating pumps, compressors, and PRDs in service as follows: 1) An operator shall audio-visually (by hearing and by sight) inspect for leaks all accessible operating pumps, compressors, and PRDs in service at least once each calendar week. 2) Any audio-visual inspection of an accessible operating pump, compressor, and PRD performed by an operator that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected not later than 24 hours after conducting the audio-visual inspection. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 3 of this Rule. [District Rule 4401, 5.4.3] Federally Enforceable Through Title V Permit
30. The operator shall also perform the following inspections: 1) An operator shall initially inspect a PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the discovery of the release. An operator shall re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection. 2) An operator shall inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service, and 3) Except for PRDs subject to the requirements of Section 5.4.4.1 of this Rule, an operator shall inspect a component that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. [District Rule 4401, 5.4.4] Federally Enforceable Through Title V Permit
31. Components located in unsafe areas shall be inspected and repaired at the next process unit turnaround and inaccessible components shall be inspected at least annually. [District Rule 4401, 5.4.7] Federally Enforceable Through Title V Permit
32. A District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. [District Rule 4401, 5.4.8] Federally Enforceable Through Title V Permit
33. Upon detection of a leak, an operator shall affix a readily visible weatherproof tag to that leaking component that includes the following information: 1) The date and time of leak detection; 2) The date and time of the leak measurement; 3) For a gaseous leak, the leak concentration in ppmv; 4) For a liquid leak, whether it is a major or minor liquid leak; and 5) Whether the component is an essential component, and unsafe-to-monitor component, or a critical component. [District Rule 4401, 5.5.1] Federally Enforceable Through Title V Permit
34. The tag shall remain affixed to the leaky component until all the following requirements are met: 1) The component is repaired or replaced, 2) The component is re-inspected as set forth in Section 6.3, and 3) The component is found to be in compliance with this Rule. [District Rule 4401, 5.5.2] Federally Enforceable Through Title V Permit
35. An operator shall minimize a component leak in order to stop or reduce leakage to the atmosphere immediately to the extent possible, but not later than one (1) hour after detection of the leak. [District Rule 4401, 5.5.3] 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.

36. Except for leaking critical components or leaking essential components subject to the requirements of Section 5.9.7, if an operator has minimized a leak but the leak still exceeds the applicable leak limits as defined in Section 3.0, an operator shall comply with at least one of the following three requirements as soon as practicable but not later than the time period specified in Table 3: 1) Repair or replace the leaking component, 2) Vent the leaking component to a VOC collection and control system as defined in Section 3.0, or 3) Remove the leaking component from operation. [District Rule 4401, 5.5.4] Federally Enforceable Through Title V Permit
37. The repair period in calendar days shall not exceed 14 days for minor gas leaks, 5 days for major gas leaks less than or equal to 50,000 ppmv, 2 days for gas leak greater than 50,000 ppmv, 3 days for minor liquid leaks, 2 days for major liquid leaks. [District Rule 4401, 5.5.4] Federally Enforceable Through Title V Permit
38. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period specified in Table 3. [District Rule 4401, 5.5.5] Federally Enforceable Through Title V Permit
39. The time of the initial leak detection shall be the start of the repair period specified in Table 3. [District Rule 4401, 5.5.6] Federally Enforceable Through Title V Permit
40. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component 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, whichever comes earlier. [District Rule 4401, 5.5.7] Federally Enforceable Through Title V Permit
41. The operator of any steam-enhanced crude oil production well shall maintain records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401, 6.1.1] Federally Enforceable Through Title V Permit
42. An operator of any steam-enhanced crude oil production well shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401, 6.1.3] Federally Enforceable Through Title V Permit
43. The operator of any steam-enhanced crude oil production well shall maintain an inspection log pursuant to Section 6.4 of Rule 4401. [District Rule 4401, 6.1.4] Federally Enforceable Through Title V Permit
44. Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, instrument reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration [District Rule 4401, 6.1.5] Federally Enforceable Through Title V Permit
45. An operator shall maintain copies at the facility of the training records of the training program operated pursuant to Section 6.5 of Rule 4401. [District Rule 4401, 6.1.6] Federally Enforceable Through Title V Permit
46. An operator shall source test annually all vapor collection and control systems used to control emissions from steam-enhanced crude oil production well vents to determine the control efficiency of the device(s) used for destruction or removal of VOC. Compliance testing shall be performed annually by source testers certified by ARB. Testing shall be performed during June, July, August, or September of each year if the system's control efficiency is dependent upon ambient air temperature. [District Rule 4401, 6.2.1] Federally Enforceable Through Title V Permit
47. If approved by EPA, ARB, and the APCO, an operator need not comply with the annual testing requirement of Section 6.2.1 if all uncondensed VOC emissions collected by a vapor collection and control system are incinerated in fuel burning equipment, an internal combustion engine or in a smokeless flare. [District Rule 4401, 6.2.2] 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.

48. An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.17 of Rule 4401: Conduct an initial TVP testing of the produced fluid in each gauge tank not later than June 14, 2007. Thereafter, an operator shall conduct periodic TVP testing of each gauge tank at least once every 24 months during summer (July - September), and whenever there is a change in the source or type of produced fluid in the gauge tank. The TVP testing shall be conducted at the actual storage temperature of the produced fluid in the gauge tank using the applicable TVP test method specified in Section 6.4 of Rule 4623 (Storage of Organic Liquids). The operator shall submit the TVP testing results to the APCO as specified in Section 6.1.9 of Rule 4401. [District Rule 4401, 6.2.3] Federally Enforceable Through Title V Permit
49. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or 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 those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4401, 6.3.1] Federally Enforceable Through Title V Permit
50. VOC content shall be analyzed by using the latest revision of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be performed by using ARB Method 432. [District Rule 4401, 6.3.2] Federally Enforceable Through Title V Permit
51. Leak inspection, other than audio-visual, and measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. Where safety is a concern, such as measuring leaks from compressor seals or pump seals when the shaft is rotating, a person shall measure leaks by placing the instrument probe inlet at a distance of one (1) centimeter or less from the surface of the component interface. [District Rule 4401, 6.3.3] Federally Enforceable Through Title V Permit
52. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401, 6.3.4] Federally Enforceable Through Title V Permit
53. The operator shall maintain an inspection log in which the operator records at least all of the following for each inspection performed: 1) The total number of components inspected, and the total number and percentage of leaking components found by component type, 2) The location, type and name or description of each leaking component and description of any unit where the leaking component is found, 3) The date of leak detection and the method of leak detection, 4) For gaseous leaks, the leak concentration in ppmv and, for liquids leaks, whether the leak is major or minor, 5) The date of repair, replacement or removal from operation of leaking components, 6) The identity and location of essential components and critical components as defined in this Rule, found leaking, that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier, 7) The methods used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than 1 year after detection, whichever comes earlier, 8) The date or re-inspection and the leak concentration in ppmv after the component is repaired or replaced, 9) The inspectors name, business mailing address, and business telephone number, and 10) The date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401, 6.4] Federally Enforceable Through Title V Permit
54. The operator shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures as necessary. [District Rule 4401, 6.5] Federally Enforceable Through Title V Permit
55. By January 30 of each year, an operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to an existing Operator Management Plan. [District Rule 4401, 6.7] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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56. All records of required monitoring data and support information shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rules 2520, 9.4.2 and 4401, 6.1]  
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-1135-173-22

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

**SECTION:** 14 **TOWNSHIP:** 31S **RANGE:** 22E

## **EQUIPMENT DESCRIPTION:**

1,600 BBL (67,200 GALLON) FIXED ROOF LACT TANK ID# WS-01, HANDLING MAXWELL LEASE PRODUCTION, AND VESSELS V-101, V-102, V-103, AND V-104; WITH VAPOR CONTROL SYSTEM SHARED WITH TANKS S-1135-174, -175, -178, -325, AND -337 (W&S LEASE) DISCHARGING TO TEOR WVCVCS S-1135-125

## **PERMIT UNIT REQUIREMENTS**

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1. The tank shall be equipped with a vapor loss prevention system consisting of vapor and condensate collection systems capable of reducing VOC emissions by at least 99%. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Vapor control system shall contain vapor control system piping network and vapor compression system consisting of two vapor compressors, fin fan aerial cooler, and knockout vessels. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Vapor control system piping network shall include vapor space piping and make-up gas serving storage tanks S-1135-173, '-174, '-175, '-178, '-325, and '-337 with vapor control piping to W&S TEOR operation S-1135-125. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Tank shall be designed and maintained to vent only to vapor control system, except during the period of tank cleaning, inspections, and maintenance allowed by this permit. [District NSR Rule] Federally Enforceable Through Title V Permit
5. All tank gauging, hatches, sampling ports, pressure relief valves, vapor control system components, etc. shall be closed and leak-free (as defined in Rule 4623) except during sampling or attended maintenance. Leak-free is a condition without a gas leak or a liquid leak. A gas leak is a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is the dripping of organic liquid at a rate of more than 3 drops per minute. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Tanks seams, welds, joints, piping, valves, and fittings shall be inspected and maintained in a leak-free (as defined in Rule 4623) condition. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Compressor knock-out drum liquids shall be piped only to vapor controlled tanks or crude sales line. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The operator shall ensure that the vapor control system is functional and is operating as designed at all times. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. Operator shall monitor vapor control system pressures on quarterly basis to ensure that system pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. The fugitive VOC emissions from this tank and the vapor control system shall not exceed 2.8 lb/day. [District NSR Rule] 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.

11. Permittee shall maintain with the permit accurate fugitive component counts for tank and associated vapor control systems and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999) Screening Range emission factors. [District NSR Rule] Federally Enforceable Through Title V Permit
12. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020] Federally Enforceable Through Title V Permit
13. There shall be no throughput during cleaning of this tank. [District Rule 2080] Federally Enforceable Through Title V Permit
14. Prior to opening the tank to allow tank cleaning, the following procedure must be followed: Operate PV valve and vapor control system during emptying, filling, and flushing. During filling and purging, no vapor leakage is allowed. Drain all liquid from the tank to the maximum extent feasible prior to opening the tank. [District Rule 2080] Federally Enforceable Through Title V Permit
15. Prior to opening the tank to allow tank cleaning, one of the following options must be followed: 1) operate the vapor control system for at least 2 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 Rule 2080] Federally Enforceable Through Title V Permit
16. Allowable methods of cleaning include using steam, diesel, 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/liter VOC content or less. Steam cleaning shall be allowed at locations where wastewater treatment facilities are limited or during December through March. [District Rule 2080] Federally Enforceable Through Title V Permit
17. Tank pressure/vacuum valve (Varec) shall be inspected on an annual basis. During the varec inspections, the varec can be removed from the tank and replaced if necessary. The permittee shall minimize emissions from the opening by plugging the opening during the removal of varec valve. [District Rule 2080] Federally Enforceable Through Title V Permit
18. The pressure transmitters shall be inspected and maintained in good operating conditions. The inspections shall be conducted on a quarterly basis. Replacing and repairing of each pressure transmitters shall not exceed one hour per day. [District NSR Rule] Federally Enforceable Through Title V Permit
19. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
20. 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
21. 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
22. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. 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 99 percent efficient as measured by EPA Method 18 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 99% control efficiency as measured by EPA Method 18 at least annually. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. 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
25. 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
26. Permittee shall maintain records of the date and duration of the vapor control system maintenance operation. Such records shall be made available for district inspection upon request for a period of at least five years. [District NSR Rule and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
27. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] 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-1135-174-9

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

**SECTION:** 14 **TOWNSHIP:** 31S **RANGE:** 22E

**EQUIPMENT DESCRIPTION:**

2,000 BBL (84,000 GALLON) FIXED ROOF WASH TANK ID# WS-02, HANDLING MAXWELL LEASE PRODUCTION, CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON S-1135-173 (W&S LEASE)

## PERMIT UNIT REQUIREMENTS

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1. The tank shall be equipped with a vapor loss prevention system consisting of vapor and condensate collection systems capable of reducing VOC emissions by at least 99%. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Tank shall be designed and maintained to vent only to vapor control system, except during the period of tank cleaning, inspections, and maintenance allowed by this permit. [District NSR Rule] Federally Enforceable Through Title V Permit
3. All tank gauging, hatches, sampling ports, pressure relief valves, vapor control system components, etc. shall be closed and leak-free (as defined in Rule 4623) except during sampling or attended maintenance. Leak-free is a condition without a gas leak or a liquid leak. A gas leak is a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is the dripping of organic liquid at a rate of more than 3 drops per minute. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Tanks seams, welds, joints, piping, valves, and fittings shall be inspected and maintained in a leak-free (as defined in Rule 4623) condition. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The fugitive VOC emissions from this tank and the vapor control system shall not exceed 0.1 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) not exceeding 0.45 psia under all storage conditions. [District Rule 4623, 4.4] Federally Enforceable Through Title V Permit
7. Permittee shall maintain with the permit accurate fugitive component counts for tank and associated vapor control systems and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999) Screening Range emission factors. [District NSR Rule] Federally Enforceable Through Title V Permit
8. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020] Federally Enforceable Through Title V Permit
9. There shall be no throughput during cleaning of this tank. [District Rule 2080] Federally Enforceable Through Title V Permit
10. Prior to opening the tank to allow tank cleaning, the following procedure must be followed: Operate PV valve and vapor control system during emptying, filling, and flushing. During filling and purging, no vapor leakage is allowed. Drain all liquid from the tank to the maximum extent feasible prior to opening the tank. [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.

11. Prior to opening the tank to allow tank cleaning, one of the following options must be followed: 1) operate the vapor control system for at least 2 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 Rule 2080] Federally Enforceable Through Title V Permit
12. Allowable methods of cleaning include using steam, diesel, 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/liter VOC content or less. Steam cleaning shall be allowed at locations where wastewater treatment facilities are limited or during December through March. [District Rule 2080] Federally Enforceable Through Title V Permit
13. Tank pressure/vacuum valve (Varec) shall be inspected on an annual basis. During the varec inspections, the varec can be removed from the tank and replaced if necessary. The permittee shall minimize emissions from the opening by plugging the opening during the removal of varec valve. [District Rule 2080] Federally Enforceable Through Title V Permit
14. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. 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
16. 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
17. 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
18. 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 99 percent efficient as measured by EPA Method 18 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 99% control efficiency as measured by EPA Method 18 at least annually. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

20. True vapor pressure shall be measured at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored using the latest version of the Lawrence Berkeley National Laboratory "Test Method for Vapor Pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rules 2520, 9.3.2 and 4623, 6.2.2] Federally Enforceable Through Title V Permit
21. 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
22. Permittee shall keep accurate records of throughput and TVP of liquids stored in each tank and such records shall be made readily available for District inspection at any time for a time period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] 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-1135-175-8

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

**SECTION:** 14 **TOWNSHIP:** 31S **RANGE:** 22E

**EQUIPMENT DESCRIPTION:**

1,600 BBL (67,200 GALLON) FIXED ROOF LACT TANK ID# WS-03, HANDLING MAXWELL LEASE PRODUCTION, CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON S-1135-173 (W&S LEASE)

## PERMIT UNIT REQUIREMENTS

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1. The tank shall be equipped with a vapor loss prevention system consisting of vapor and condensate collection systems capable of reducing VOC emissions by at least 99%. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Tank shall be designed and maintained to vent only to vapor control system, except during the period of tank cleaning, inspections, and maintenance allowed by this permit. [District NSR Rule] Federally Enforceable Through Title V Permit
3. All tank gauging, hatches, sampling ports, pressure relief valves, vapor control system components, etc. shall be closed and leak-free (as defined in Rule 4623) except during sampling or attended maintenance. Leak-free is a condition without a gas leak or a liquid leak. A gas leak is a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is the dripping of organic liquid at a rate of more than 3 drops per minute. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Tanks seams, welds, joints, piping, valves, and fittings shall be inspected and maintained in a leak-free (as defined in Rule 4623) condition. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The fugitive VOC emissions from this tank and the vapor control system shall not exceed 0.1 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) not exceeding 0.45 psia under all storage conditions. [District Rule 4623, 4.4] Federally Enforceable Through Title V Permit
7. Permittee shall maintain with the permit accurate fugitive component counts for tank and associated vapor control systems and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999) Screening Range emission factors. [District NSR Rule] Federally Enforceable Through Title V Permit
8. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020] Federally Enforceable Through Title V Permit
9. There shall be no throughput during cleaning of this tank. [District Rule 2080] Federally Enforceable Through Title V Permit
10. Prior to opening the tank to allow tank cleaning, the following procedure must be followed: Operate PV valve and vapor control system during emptying, filling, and flushing. During filling and purging, no vapor leakage is allowed. Drain all liquid from the tank to the maximum extent feasible prior to opening the tank. [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.

11. Prior to opening the tank to allow tank cleaning, one of the following options must be followed: 1) operate the vapor recovery system for at least 2 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 Rule 2080] Federally Enforceable Through Title V Permit
12. Allowable methods of cleaning include using steam, diesel, 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/liter VOC content or less. Steam cleaning shall be allowed at locations where wastewater treatment facilities are limited or during December through March. [District Rule 2080] Federally Enforceable Through Title V Permit
13. Tank pressure/vacuum valve (Varec) shall be inspected on an annual basis. During the varec inspections, the varec can be removed from the tank and replaced if necessary. The permittee shall minimize emissions from the opening by plugging the opening during the removal of varec valve. [District Rule 2080] Federally Enforceable Through Title V Permit
14. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. 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
16. 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
17. 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
18. 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 99 percent efficient as measured by EPA Method 18 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 99% control efficiency as measured by EPA Method 18 at least annually. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

20. True vapor pressure shall be measured at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored using the latest version of the Lawrence Berkeley National Laboratory "Test Method for Vapor Pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rules 2520, 9.3.2 and 4623, 6.2.2] Federally Enforceable Through Title V Permit
21. 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
22. Permittee shall keep accurate records of throughput and TVP of liquids stored in each tank and such records shall be made readily available for District inspection at any time for a time period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] 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-1135-178-10

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

**SECTION:** 14 **TOWNSHIP:** 31S **RANGE:** 22E

**EQUIPMENT DESCRIPTION:**

3,000 BBL (126,000 GALLON) FIXED ROOF SUMP PROCESS TANK ID# WS-06, HANDLING MAXWELL LEASE PRODUCTION, CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON S-1135-173 (W&S LEASE)

## PERMIT UNIT REQUIREMENTS

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1. Tank shall be designed and maintained to vent only to vapor control system, except during the period of tank cleaning, inspections, and maintenance allowed by this permit. [District NSR Rule] Federally Enforceable Through Title V Permit
2. All tank gauging, hatches, sampling ports, pressure relief valves, vapor control system components, etc. shall be closed and leak-free (as defined in Rule 4623) except during sampling or attended maintenance. Leak-free is a condition without a gas leak or a liquid leak. A gas leak is a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is the dripping of organic liquid at a rate of more than 3 drops per minute. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Tanks seams, welds, joints, piping, valves, and fittings shall be inspected and maintained in a leak-free (as defined in Rule 4623) condition. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The fugitive VOC emissions from this tank and the vapor control system shall not exceed 0.1 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) not exceeding 0.45 psia under all storage conditions. [District Rule 4623, 4.4] Federally Enforceable Through Title V Permit
6. Permittee shall maintain with the permit accurate fugitive component counts for tank and associated vapor control systems and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999) Screening Range emission factors. [District NSR Rule] Federally Enforceable Through Title V Permit
7. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020] Federally Enforceable Through Title V Permit
8. There shall be no throughput during cleaning of this tank. [District Rule 2080] Federally Enforceable Through Title V Permit
9. Prior to opening the tank to allow tank cleaning, the following procedure must be followed: Operate PV valve and vapor control system during emptying, filling, and flushing. During filling and purging, no vapor leakage is allowed. Drain all liquid from the tank to the maximum extent feasible prior to opening the tank. [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.

10. Prior to opening the tank to allow tank cleaning, one of the following options must be followed: 1) operate the vapor control system for at least 2 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 Rule 2080] Federally Enforceable Through Title V Permit
11. Allowable methods of cleaning include using steam, diesel, 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/liter VOC content or less. Steam cleaning shall be allowed at locations where wastewater treatment facilities are limited or during December through March. [District Rule 2080] Federally Enforceable Through Title V Permit
12. Tank pressure/vacuum valve (Varec) shall be inspected on an annual basis. During the varec inspections, the varec can be removed from the tank and replaced if necessary. The permittee shall minimize emissions from the opening by plugging the opening during the removal of varec valve. [District Rule 2080] Federally Enforceable Through Title V Permit
13. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. 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
15. 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
16. 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
17. 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 99 percent efficient as measured by EPA Method 18 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 99% control efficiency as measured by EPA Method 18 at least annually. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

19. True vapor pressure shall be measured at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored using the latest version of the Lawrence Berkeley National Laboratory "Test Method for Vapor Pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rules 2520, 9.3.2 and 4623, 6.2.2] Federally Enforceable Through Title V Permit
20. 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
21. Permittee shall keep accurate records of throughput and TVP of liquids stored in each tank and such records shall be made readily available for District inspection at any time for a time period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
22. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] 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-1135-325-2

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

**EQUIPMENT DESCRIPTION:**

3,000 BBL FIXED ROOF CRUDE OIL STORAGE TANK, HANDLING MAXWELL LEASE PRODUCTION, SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-1135-173 (W & S LEASE)

## PERMIT UNIT REQUIREMENTS

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1. The tank shall be equipped with a vapor loss prevention system consisting of vapor and condensate collection systems capable of reducing VOC emissions by at least 99%. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Tank shall be designed and maintained to vent only to vapor control system, except during the period of tank cleaning, inspections, and maintenance allowed by this permit. [District NSR Rule] Federally Enforceable Through Title V Permit
3. All tank gauging, hatches, sampling ports, pressure relief valves, vapor control system components, etc. shall be closed and leak-free (as defined in Rule 4623) except during sampling or attended maintenance. Leak-free is a condition without a gas leak or a liquid leak. A gas leak is a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is the dripping of organic liquid at a rate of more than 3 drops per minute. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Tanks seams, welds, joints, piping, valves, and fittings shall be inspected and maintained in a leak-free (as defined in Rule 4623) condition. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The fugitive VOC emissions from this tank and the vapor control system shall not exceed 0.47 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Permittee shall maintain with the permit accurate fugitive component counts for tank and associated vapor control systems and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999) Screening Range emission factors. [District NSR Rule] Federally Enforceable Through Title V Permit
7. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020] Federally Enforceable Through Title V Permit
8. There shall be no throughput during cleaning of this tank. [District Rule 2080] Federally Enforceable Through Title V Permit
9. Prior to opening the tank to allow tank cleaning, the following procedure must be followed: Operate PV valve and vapor control system during emptying, filling, and flushing. During filling and purging, no vapor leakage is allowed. Drain all liquid from the tank to the maximum extent feasible prior to opening the tank. [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.

10. Prior to opening the tank to allow tank cleaning, one of the following options must be followed: 1) operate the vapor control system for at least 2 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 Rule 2080] Federally Enforceable Through Title V Permit
11. Allowable methods of cleaning include using steam, diesel, 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/liter VOC content or less. Steam cleaning shall be allowed at locations where wastewater treatment facilities are limited or during December through March. [District Rule 2080] Federally Enforceable Through Title V Permit
12. Tank pressure/vacuum valve (Varec) shall be inspected on an annual basis. During the varec inspections, the varec can be removed from the tank and replaced if necessary. The permittee shall minimize emissions from the opening by plugging the opening during the removal of varec valve. [District Rule 2080] Federally Enforceable Through Title V Permit
13. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. 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
15. 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
16. 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
17. 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 99 percent efficient as measured by EPA Method 18 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 99% control efficiency as measured by EPA Method 18 at least annually. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

19. 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
20. This unit has a storage capacity less than 420,000 gallons (1,589.874 cubic meters) and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] 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-1135-337-2

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

**EQUIPMENT DESCRIPTION:**

3,000 BBL (126,000 GALLON) FIXED ROOF STOCK TANK ID# WS-04, HANDLING MAXWELL LEASE PRODUCTION, CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON S-1135-173 (W&S LEASE)

## PERMIT UNIT REQUIREMENTS

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1. The tank shall be equipped with a vapor loss prevention system consisting of vapor and condensate collection systems capable of reducing VOC emissions by at least 99%. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Tank shall be designed and maintained to vent only to vapor control system, except during the period of tank cleaning, inspections, and maintenance allowed by this permit. [District NSR Rule] Federally Enforceable Through Title V Permit
3. All tank gauging, hatches, sampling ports, pressure relief valves, vapor control system components, etc. shall be closed and leak-free (as defined in Rule 4623) except during sampling or attended maintenance. Leak-free is a condition without a gas leak or a liquid leak. A gas leak is a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is the dripping of organic liquid at a rate of more than 3 drops per minute. [District NSR Rule and Rule 4623] Federally Enforceable Through Title V Permit
4. Tanks seams, welds, joints, piping, valves, and fittings shall be inspected and maintained in a leak-free (as defined in Rule 4623) condition. [District NSR Rule and Rule 4623] Federally Enforceable Through Title V Permit
5. The fugitive VOC emissions from this tank and the vapor control system shall not exceed 0.2 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Permittee shall maintain with the permit accurate fugitive component counts for tank and associated vapor control systems and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999) Screening Range emission factors. [District NSR Rule] Federally Enforceable Through Title V Permit
7. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020] Federally Enforceable Through Title V Permit
8. There shall be no throughput during cleaning of this tank. [District Rule 2080] Federally Enforceable Through Title V Permit
9. Prior to opening the tank to allow tank cleaning, the following procedure must be followed: Operate PV valve and vapor control system during emptying, filling, and flushing. During filling and purging, no vapor leakage is allowed. Drain all liquid from the tank to the maximum extent feasible prior to opening the tank. [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.

10. Prior to opening the tank to allow tank cleaning, one of the following options must be followed: 1) operate the vapor control system for at least 2 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 Rule 2080] Federally Enforceable Through Title V Permit
11. Allowable methods of cleaning include using steam, diesel, 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/liter VOC content or less. Steam cleaning shall be allowed at locations where wastewater treatment facilities are limited or during December through March. [District Rule 2080] Federally Enforceable Through Title V Permit
12. Tank pressure/vacuum valve (Varec) shall be inspected on an annual basis. During the varec inspections, the varec can be removed from the tank and replaced if necessary. The permittee shall minimize emissions from the opening by plugging the opening during the removal of varec valve. [District Rule 2080] Federally Enforceable Through Title V Permit
13. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. 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
15. 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
16. 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
17. 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 99 percent efficient as measured by EPA Method 18 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 99% control efficiency as measured by EPA Method 18 at least annually. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

19. 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
20. This unit has a storage capacity less than 420,000 gallons (1,589.874 cubic meters) and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40 CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
21. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit

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

**APPENDIX B**  
**Draft ATCs**

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** S-1135-124-17

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

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

**SECTION:** NW15 **TOWNSHIP:** 31S **RANGE:** 22E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY (TEOR) OPERATION SERVING 254 STEAM ENHANCED WELLS, AND TIED TO TEOR '293 INCLUDING PIPING TO BALANCED CGCS, RE-INJECTION COMPRESSORS OR INCINERATING STEAM GENERATORS (EXETER LEASE): INCLUDE VEDDER LEASE WELLS IN WELL COUNT AND REMOVE "OR INCINERATING STEAM GENERATORS" FROM EQUIPMENT DESCRIPTION

**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. Well vent vapor control system VOC fugitive emission rate shall not exceed 50.8 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Permittee shall maintain with the permit accurate fugitive component counts for well vent vapor control system and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999) Oil and Gas Production, Screening Value Range emission factors. [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-1135-124-17 · May 26 2015 7:03AM -- TORID : Joint Inspection NOT Required

5. {1309} Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
6. Compliance with permit conditions in the Title V permit shall be deemed compliance with SJVUAPCD Rule 4401 (Amended January 15, 1998), excluding sections 5.1 and 5.2 for control systems which have been waived from complying with the requirement of section 6.2.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
7. {1769} The crude oil production wells associated with this unit do not have production enhanced by in-situ combustion. Therefore, the requirements of SJVUAPCD Rule 4407 (Adopted May 19, 1994) do not apply to this permit unit. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
8. Operation shall include noncondensable vapor piping from vapor control skids to balanced system and re-injection compressors. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Operation shall include vapor control skids including: various size knockout vessels with liquid pumps, gas scrubbers, heat exchangers, vapor compressors, and piping to District approved disposal devices. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Piping to re-injection system shall include re-injection knock out vessels, interstage coolers & gas/liquid separators, injection gas compressors and liquid transfer pumps, as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
11. TEOR gas injected into formation shall only be performed using DOG approved injection wells. [District Rule 2080] Federally Enforceable Through Title V Permit
12. Permittee shall cease injecting vapors and notify the District immediately if DOG injection approval is revoked, denied, terminated, surrendered or altered to disallow injection. [District Rule 2080] Federally Enforceable Through Title V Permit
13. A listing of all steam enhanced wells connected to this system shall be maintained onsite and readily available to the District upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Vapor collection piping TEORs S-1135-124 and '-293 shall be contained in a balanced CGCS or collected at VR skid(s) and piped to approved injection wells. [District Rule 2201] Federally Enforceable Through Title V Permit
15. TEOR gas not re-injected to the formation shall be contained within balanced casing vent collection system, or well casing vents shall be closed and produced fluids handled only in controlled production equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be kept of injection well(s) utilized and volume of vapors injected. Records shall be made readily available to the District upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
17. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the requirements of District Rule 4401. [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
18. The fugitive emissions component inspection and reinspection requirements of Section 5.4.1 through Section 5.4.7 of this rule shall not apply to components exclusively handling gas/vapor or liquid with a VOC content of ten percent by weight or less (≤10 wt.%), as determined by the test methods in Section 6.3.4. [District Rule 4401] Federally Enforceable Through Title V Permit
19. The uncontrolled VOC emissions from any well vent shall be reduced by at least 99 percent by weight or, if several steam-enhanced crude oil production well vents are connected to a vapor collection and control system, total uncontrolled VOC emissions shall be reduced by at least 99 percent. [District Rule 4401, 5.1 and 5.2] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

20. An operator shall not operate a steam-enhanced crude oil production well unless either of the following two conditions are met: 1) The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids is connected to a VOC collection and control system as defined in Section 3.0 of this Rule or 2) the steam-enhanced crude oil production well vent is open and the well vent is connected to a VOC collection and control system as defined in Section 3.0. [District Rule 4401, 5.5.1 and 5.5.2] Federally Enforceable Through Title V Permit
21. There shall be no open-ended line or a valve located at the end of the line that is not sealed with a blind flange, plug, cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended lines. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401, 5.2.2.1] Federally Enforceable Through Title V Permit
22. There shall be no components with a major liquid leak as defined in Section 3.20.2 of Rule 4401. [District Rule 4401, 5.2.2.2] Federally Enforceable Through Title V Permit
23. There shall be no components with a gas leak of greater than 50,000 ppmv. [District Rule 4401, 5.2.2.3] Federally Enforceable Through Title V Permit
24. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of any combination of components with minor liquid leaks, minor gas leaks, or gas leaks greater than 10,000 ppmv up to 50,000 ppmv that totals more than number of leaks allowed by Table 2 of Rule 4401. [District Rule 4401, 5.2] Federally Enforceable Through Title V Permit
25. No leaking components (as defined in Section 5.2.2 of Rule 4401) may be used unless they have been identified with a tag for repair, are repaired, or awaiting re-inspection after being repaired within the applicable time frame specified in Section 5.5. [District Rule 4401, 5.7.1] Federally Enforceable Through Title V Permit
26. Each hatch shall be closed at all times except during attended repair, replacement, or maintenance operations, providing such activities are done as expeditiously as possible with minimal spillage or material and VOC emissions into the atmosphere. [District Rule 4401, 5.3.2] Federally Enforceable Through Title V Permit
27. The operator shall comply with the requirements of Section 6.7 if there is any change in the description of major components or critical components. [District Rule 4401, 5.3.3] Federally Enforceable Through Title V Permit
28. Unless otherwise specified in Section 5.4, an operator shall perform all component inspections and gas leak measurements pursuant to the requirements of Section 6.3.3. [District Rule 4401, 5.4] Federally Enforceable Through Title V Permit
29. Except for pipes and unsafe-to-monitor components, an operator shall inspect all other components pursuant to the requirements of Section 6.3.3 at least once every year. [District Rule 4401, 5.4.1] Federally Enforceable Through Title V Permit
30. An operator shall visually inspect all pipes at least once every year. Any visual inspection of pipes that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected within 24 hours after detecting the leak. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 3 of this Rule. [District Rule 4401, 5.4.2] Federally Enforceable Through Title V Permit
31. An operator shall inspect for leaks all accessible operating pumps, compressors, and PRDs in service as follows: 1) An operator shall audio-visually (by hearing and by sight) inspect for leaks all accessible operating pumps, compressors, and PRDs in service at least once each calendar week. 2) Any audio-visual inspection of an accessible operating pump, compressor, and PRD performed by an operator that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected not later than 24 hours after conducting the audio-visual inspection. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 3 of this Rule. [District Rule 4401, 5.4.3] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

32. The operator shall also perform the following inspections: 1) An operator shall initially inspect a PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the discovery of the release. An operator shall re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection. 2) An operator shall inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service, and 3) Except for PRDs subject to the requirements of Section 5.4.4.1 of this Rule, an operator shall inspect a component that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. [District Rule 4401, 5.4.4] Federally Enforceable Through Title V Permit
33. Components located in unsafe areas shall be inspected and repaired at the next process unit turnaround and inaccessible components shall be inspected at least annually. [District Rule 4401, 5.4.7] Federally Enforceable Through Title V Permit
34. A District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. [District Rule 4401, 5.4.8] Federally Enforceable Through Title V Permit
35. Upon detection of a leak, an operator shall affix a readily visible weatherproof tag to that leaking component that includes the following information: 1) The date and time of leak detection; 2) The date and time of the leak measurement; 3) For a gaseous leak, the leak concentration in ppmv; 4) For a liquid leak, whether it is a major or minor liquid leak; and 5) Whether the component is an essential component, and unsafe-to-monitor component, or a critical component. [District Rule 4401, 5.5.1] Federally Enforceable Through Title V Permit
36. The tag shall remain affixed to the leaky component until all the following requirements are met: 1) The component is repaired or replaced, 2) The component is re-inspected as set forth in Section 6.3, and 3) The component is found to be in compliance with this Rule. [District Rule 4401, 5.5.2] Federally Enforceable Through Title V Permit
37. An operator shall minimize a component leak in order to stop or reduce leakage to the atmosphere immediately to the extent possible, but not later than one (1) hour after detection of the leak. [District Rule 4401, 5.5.3] Federally Enforceable Through Title V Permit
38. Except for leaking critical components or leaking essential components subject to the requirements of Section 5.9.7, if an operator has minimized a leak but the leak still exceeds the applicable leak limits as defined in Section 3.0, an operator shall comply with at least one of the following three requirements as soon as practicable but not later than the time period specified in Table 3: 1) Repair or replace the leaking component, 2) Vent the leaking component to a VOC collection and control system as defined in Section 3.0, or 3) Remove the leaking component from operation. [District Rule 4401, 5.5.4] Federally Enforceable Through Title V Permit
39. The repair period in calendar days shall not exceed 14 days for minor gas leaks, 5 days for major gas leaks less than or equal to 50,000 ppmv, 2 days for gas leak greater than 50,000 ppmv, 3 days for minor liquid leaks, 2 days for major liquid leaks. [District Rule 4401, 5.5.4] Federally Enforceable Through Title V Permit
40. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period specified in Table 3. [District Rule 4401, 5.5.5] Federally Enforceable Through Title V Permit
41. The time of the initial leak detection shall be the start of the repair period specified in Table 3. [District Rule 4401, 5.5.6] Federally Enforceable Through Title V Permit
42. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component 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, whichever comes earlier. [District Rule 4401, 5.5.7] Federally Enforceable Through Title V Permit
43. The operator of any steam-enhanced crude oil production well shall maintain records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401, 6.1.1] Federally Enforceable Through Title V Permit
44. An operator of any steam-enhanced crude oil production well shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401, 6.1.3] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

45. The operator of any steam-enhanced crude oil production well shall maintain an inspection log pursuant to Section 6.4 of Rule 4401. [District Rule 4401, 6.1.4] Federally Enforceable Through Title V Permit
46. Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, instrument reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration [District Rule 4401, 6.1.5] Federally Enforceable Through Title V Permit
47. An operator shall maintain copies at the facility of the training records of the training program operated pursuant to Section 6.5 of Rule 4401. [District Rule 4401, 6.1.6] Federally Enforceable Through Title V Permit
48. An operator shall source test annually all vapor collection and control systems used to control emissions from steam-enhanced crude oil production well vents to determine the control efficiency of the device(s) used for destruction or removal of VOC. Compliance testing shall be performed annually by source testers certified by ARB. Testing shall be performed during June, July, August, or September of each year if the system's control efficiency is dependent upon ambient air temperature. [District Rule 4401, 6.2.1] Federally Enforceable Through Title V Permit
49. If approved by EPA, ARB, and the APCO, an operator need not comply with the annual testing requirement of Section 6.2.1 if all uncondensed VOC emissions collected by a vapor collection and control system are incinerated in fuel burning equipment, an internal combustion engine or in a smokeless flare. [District Rule 4401, 6.2.2] Federally Enforceable Through Title V Permit
50. An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.17 of Rule 4401: Conduct an initial TVP testing of the produced fluid in each gauge tank not later than June 14, 2007. Thereafter, an operator shall conduct periodic TVP testing of each gauge tank at least once every 24 months during summer (July - September), and whenever there is a change in the source or type of produced fluid in the gauge tank. The TVP testing shall be conducted at the actual storage temperature of the produced fluid in the gauge tank using the applicable TVP test method specified in Section 6.4 of Rule 4623 (Storage of Organic Liquids). The operator shall submit the TVP testing results to the APCO as specified in Section 6.1.9 of Rule 4401. [District Rule 4401, 6.2.3] Federally Enforceable Through Title V Permit
51. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or 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 those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4401, 6.3.1] Federally Enforceable Through Title V Permit
52. VOC content shall be analyzed by using the latest revision of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be performed by using ARB Method 432. [District Rule 4401, 6.3.2] Federally Enforceable Through Title V Permit
53. Leak inspection, other than audio-visual, and measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. Where safety is a concern, such as measuring leaks from compressor seals or pump seals when the shaft is rotating, a person shall measure leaks by placing the instrument probe inlet at a distance of one (1) centimeter or less from the surface of the component interface. [District Rule 4401, 6.3.3] Federally Enforceable Through Title V Permit
54. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401, 6.3.4] Federally Enforceable Through Title V Permit

55. The operator shall maintain an inspection log in which the operator records at least all of the following for each inspection performed: 1) The total number of components inspected, and the total number and percentage of leaking components found by component type, 2) The location, type and name or description of each leaking component and description of any unit where the leaking component is found, 3) The date of leak detection and the method of leak detection, 4) For gaseous leaks, the leak concentration in ppmv and, for liquids leaks, whether the leak is major or minor, 5) The date of repair, replacement or removal from operation of leaking components, 6) The identity and location of essential components and critical components as defined in this Rule, found leaking, that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier, 7) The methods used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than 1 year after detection, whichever comes earlier, 8) The date or re-inspection and the leak concentration in ppmv after the component is repaired or replaced, 9) The inspectors name, business mailing address, and business telephone number, and 10) The date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401, 6.4] Federally Enforceable Through Title V Permit
56. The operator shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures as necessary. [District Rule 4401, 6.5] Federally Enforceable Through Title V Permit
57. By January 30 of each year, an operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to an existing Operator Management Plan. [District Rule 4401, 6.7] Federally Enforceable Through Title V Permit
58. All records of required monitoring data and support information shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rules 2520, 9.4.2 and 4401, 6.1] 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-1135-173-23

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

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

**SECTION:** 14 **TOWNSHIP:** 31S **RANGE:** 22E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 1,600 BBL (67,200 GALLON) FIXED ROOF LACT TANK ID# WS-01, AND VESSELS V-101, V-102, V-103, AND V-104; WITH VAPOR CONTROL SYSTEM SHARED WITH TANKS S-1135-174, -175, -178, -325, AND -337 (W&S LEASE) DISCHARGING TO TEOR WVCES S-1135-125: AUTHORIZE RECEIPT OF VEDDER LEASE PRODUCTION

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. The tank shall be equipped with a vapor loss prevention system consisting of vapor and condensate collection systems capable of reducing VOC emissions by at least 99%. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Vapor control system shall contain vapor control system piping network and vapor compression system consisting of two vapor compressors, fin fan aerial cooler, and knockout vessels. [District NSR Rule] 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-1135-173-23 May 26 2015 7:03AM -- TORID : Joint Inspection NOT Required

5. Vapor control system piping network shall include vapor space piping and make-up gas serving storage tanks S-1135-173, '-174, '-175, '-178, '-325, and '-337 with vapor control piping to W&S TEOR operation S-1135-125. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Tank shall be designed and maintained to vent only to vapor control system, except during the period of tank cleaning, inspections, and maintenance allowed by this permit. [District NSR Rule] Federally Enforceable Through Title V Permit
7. All tank gauging, hatches, sampling ports, pressure relief valves, vapor control system components, etc. shall be closed and leak-free (as defined in Rule 4623) except during sampling or attended maintenance. Leak-free is a condition without a gas leak or a liquid leak. A gas leak is a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is the dripping of organic liquid at a rate of more than 3 drops per minute. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Tanks seams, welds, joints, piping, valves, and fittings shall be inspected and maintained in a leak-free (as defined in Rule 4623) condition. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Compressor knock-out drum liquids shall be piped only to vapor controlled tanks or crude sales line. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The operator shall ensure that the vapor control system is functional and is operating as designed at all times. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. Operator shall monitor vapor control system pressures on quarterly basis to ensure that system pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. The fugitive VOC emissions from this tank and the vapor control system shall not exceed 2.8 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Permittee shall maintain with the permit accurate fugitive component counts for tank and associated vapor control systems and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999) Screening Range emission factors. [District NSR Rule] Federally Enforceable Through Title V Permit
14. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020] Federally Enforceable Through Title V Permit
15. There shall be no throughput during cleaning of this tank. [District Rule 2080] Federally Enforceable Through Title V Permit
16. Prior to opening the tank to allow tank cleaning, the following procedure must be followed: Operate PV valve and vapor control system during emptying, filling, and flushing. During filling and purging, no vapor leakage is allowed. Drain all liquid from the tank to the maximum extent feasible prior to opening the tank. [District Rule 2080] Federally Enforceable Through Title V Permit
17. Prior to opening the tank to allow tank cleaning, one of the following options must be followed: 1) operate the vapor control system for at least 2 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 Rule 2080] Federally Enforceable Through Title V Permit
18. Allowable methods of cleaning include using steam, diesel, 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/liter VOC content or less. Steam cleaning shall be allowed at locations where wastewater treatment facilities are limited or during December through March. [District Rule 2080] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

19. Tank pressure/vacuum valve (Varec) shall be inspected on an annual basis. During the varec inspections, the varec can be removed from the tank and replaced if necessary. The permittee shall minimize emissions from the opening by plugging the opening during the removal of varec valve. [District Rule 2080] Federally Enforceable Through Title V Permit
20. The pressure transmitters shall be inspected and maintained in good operating conditions. The inspections shall be conducted on a quarterly basis. Replacing and repairing of each pressure transmitters shall not exceed one hour per day. [District NSR Rule] Federally Enforceable Through Title V Permit
21. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
22. 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
23. 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
24. 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
25. 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 99 percent efficient as measured by EPA Method 18 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 99% control efficiency as measured by EPA Method 18 at least annually. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
26. 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
27. 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
28. Permittee shall maintain records of the date and duration of the vapor control system maintenance operation. Such records shall be made available for district inspection upon request for a period of at least five years. [District NSR Rule and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

29. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] 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-1135-174-10

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

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

**SECTION:** 14 **TOWNSHIP:** 31S **RANGE:** 22E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 2,000 BBL (84,000 GALLON) FIXED ROOF WASH TANK ID# WS-02, CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON S-1135-173 (W&S LEASE): AUTHORIZE RECEIPT OF VEDDER LEASE PRODUCTION

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. The tank shall be equipped with a vapor loss prevention system consisting of vapor and condensate collection systems capable of reducing VOC emissions by at least 99%. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Tank shall be designed and maintained to vent only to vapor control system, except during the period of tank cleaning, inspections, and maintenance allowed by this permit. [District NSR Rule] 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-1135-174-10 : May 26 2015 7:03AM - TORID : Joint Inspection NOT Required

5. All tank gauging, hatches, sampling ports, pressure relief valves, vapor control system components, etc. shall be closed and leak-free (as defined in Rule 4623) except during sampling or attended maintenance. Leak-free is a condition without a gas leak or a liquid leak. A gas leak is a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is the dripping of organic liquid at a rate of more than 3 drops per minute. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Tanks seams, welds, joints, piping, valves, and fittings shall be inspected and maintained in a leak-free (as defined in Rule 4623) condition. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The fugitive VOC emissions from this tank and the vapor control system shall not exceed 0.1 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
8. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) not exceeding 0.45 psia under all storage conditions. [District Rule 4623, 4.4] Federally Enforceable Through Title V Permit
9. Permittee shall maintain with the permit accurate fugitive component counts for tank and associated vapor control systems and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999) Screening Range emission factors. [District NSR Rule] Federally Enforceable Through Title V Permit
10. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020] Federally Enforceable Through Title V Permit
11. There shall be no throughput during cleaning of this tank. [District Rule 2080] Federally Enforceable Through Title V Permit
12. Prior to opening the tank to allow tank cleaning, the following procedure must be followed: Operate PV valve and vapor control system during emptying, filling, and flushing. During filling and purging, no vapor leakage is allowed. Drain all liquid from the tank to the maximum extent feasible prior to opening the tank. [District Rule 2080] Federally Enforceable Through Title V Permit
13. Prior to opening the tank to allow tank cleaning, one of the following options must be followed: 1) operate the vapor control system for at least 2 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 Rule 2080] Federally Enforceable Through Title V Permit
14. Allowable methods of cleaning include using steam, diesel, 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/liter VOC content or less. Steam cleaning shall be allowed at locations where wastewater treatment facilities are limited or during December through March. [District Rule 2080] Federally Enforceable Through Title V Permit
15. Tank pressure/vacuum valve (Varec) shall be inspected on an annual basis. During the varec inspections, the varec can be removed from the tank and replaced if necessary. The permittee shall minimize emissions from the opening by plugging the opening during the removal of varec valve. [District Rule 2080] Federally Enforceable Through Title V Permit
16. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

17. 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
18. 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
19. 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
20. 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 99 percent efficient as measured by EPA Method 18 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 99% control efficiency as measured by EPA Method 18 at least annually. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
21. 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
22. True vapor pressure shall be measured at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored using the latest version of the Lawrence Berkeley National Laboratory "Test Method for Vapor Pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rules 2520, 9.3.2 and 4623, 6.2.2] Federally Enforceable Through Title V Permit
23. 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
24. Permittee shall keep accurate records of throughput and TVP of liquids stored in each tank and such records shall be made readily available for District inspection at any time for a time period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
25. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] 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-1135-175-9

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

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

**SECTION:** 14 **TOWNSHIP:** 31S **RANGE:** 22E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 1,600 BBL (67,200 GALLON) FIXED ROOF LACT TANK ID# WS-03, CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON S-1135-173 (W&S LEASE): AUTHORIZE RECEIPT OF VEDDER LEASE PRODUCTION

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. The tank shall be equipped with a vapor loss prevention system consisting of vapor and condensate collection systems capable of reducing VOC emissions by at least 99%. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Tank shall be designed and maintained to vent only to vapor control system, except during the period of tank cleaning, inspections, and maintenance allowed by this permit. [District NSR Rule] 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-1135-175-9 : May 26 2015 7:03AM - TORID : Joint Inspection NOT Required

5. All tank gauging, hatches, sampling ports, pressure relief valves, vapor control system components, etc. shall be closed and leak-free (as defined in Rule 4623) except during sampling or attended maintenance. Leak-free is a condition without a gas leak or a liquid leak. A gas leak is a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is the dripping of organic liquid at a rate of more than 3 drops per minute. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Tanks seams, welds, joints, piping, valves, and fittings shall be inspected and maintained in a leak-free (as defined in Rule 4623) condition. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The fugitive VOC emissions from this tank and the vapor control system shall not exceed 0.1 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
8. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) not exceeding 0.45 psia under all storage conditions. [District Rule 4623, 4.4] Federally Enforceable Through Title V Permit
9. Permittee shall maintain with the permit accurate fugitive component counts for tank and associated vapor control systems and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999) Screening Range emission factors. [District NSR Rule] Federally Enforceable Through Title V Permit
10. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020] Federally Enforceable Through Title V Permit
11. There shall be no throughput during cleaning of this tank. [District Rule 2080] Federally Enforceable Through Title V Permit
12. Prior to opening the tank to allow tank cleaning, the following procedure must be followed: Operate PV valve and vapor control system during emptying, filling, and flushing. During filling and purging, no vapor leakage is allowed. Drain all liquid from the tank to the maximum extent feasible prior to opening the tank. [District Rule 2080] Federally Enforceable Through Title V Permit
13. Prior to opening the tank to allow tank cleaning, one of the following options must be followed: 1) operate the vapor recovery system for at least 2 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 Rule 2080] Federally Enforceable Through Title V Permit
14. Allowable methods of cleaning include using steam, diesel, 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/liter VOC content or less. Steam cleaning shall be allowed at locations where wastewater treatment facilities are limited or during December through March. [District Rule 2080] Federally Enforceable Through Title V Permit
15. Tank pressure/vacuum valve (Varec) shall be inspected on an annual basis. During the varec inspections, the varec can be removed from the tank and replaced if necessary. The permittee shall minimize emissions from the opening by plugging the opening during the removal of varec valve. [District Rule 2080] Federally Enforceable Through Title V Permit
16. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

17. 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
18. 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
19. 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
20. 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 99 percent efficient as measured by EPA Method 18 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 99% control efficiency as measured by EPA Method 18 at least annually. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
21. 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
22. True vapor pressure shall be measured at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored using the latest version of the Lawrence Berkeley National Laboratory "Test Method for Vapor Pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rules 2520, 9.3.2 and 4623, 6.2.2] Federally Enforceable Through Title V Permit
23. 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
24. Permittee shall keep accurate records of throughput and TVP of liquids stored in each tank and such records shall be made readily available for District inspection at any time for a time period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
25. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE: DRAFT**

**PERMIT NO:** S-1135-178-11

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

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

**SECTION:** 14 **TOWNSHIP:** 31S **RANGE:** 22E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 3,000 BBL (126,000 GALLON) FIXED ROOF SUMP PROCESS TANK ID# WS-06, CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON S-1135-173 (W&S LEASE): AUTHORIZE RECEIPT OF VEDDER LEASE PRODUCTION

**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 shall be designed and maintained to vent only to vapor control system, except during the period of tank cleaning, inspections, and maintenance allowed by this permit. [District NSR Rule] Federally Enforceable Through Title V Permit
4. All tank gauging, hatches, sampling ports, pressure relief valves, vapor control system components, etc. shall be closed and leak-free (as defined in Rule 4623) except during sampling or attended maintenance. Leak-free is a condition without a gas leak or a liquid leak. A gas leak is a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is the dripping of organic liquid at a rate of more than 3 drops per minute. [District NSR Rule] 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-1135-178-11 : May 26 2015 7:03AM -- TORID : Joint Inspection NOT Required

5. Tanks seams, welds, joints, piping, valves, and fittings shall be inspected and maintained in a leak-free (as defined in Rule 4623) condition. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The fugitive VOC emissions from this tank and the vapor control system shall not exceed 0.1 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
7. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) not exceeding 0.45 psia under all storage conditions. [District Rule 4623, 4.4] Federally Enforceable Through Title V Permit
8. Permittee shall maintain with the permit accurate fugitive component counts for tank and associated vapor control systems and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999) Screening Range emission factors. [District NSR Rule] Federally Enforceable Through Title V Permit
9. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020] Federally Enforceable Through Title V Permit
10. There shall be no throughput during cleaning of this tank. [District Rule 2080] Federally Enforceable Through Title V Permit
11. Prior to opening the tank to allow tank cleaning, the following procedure must be followed: Operate PV valve and vapor control system during emptying, filling, and flushing. During filling and purging, no vapor leakage is allowed. Drain all liquid from the tank to the maximum extent feasible prior to opening the tank. [District Rule 2080] Federally Enforceable Through Title V Permit
12. Prior to opening the tank to allow tank cleaning, one of the following options must be followed: 1) operate the vapor control system for at least 2 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 Rule 2080] Federally Enforceable Through Title V Permit
13. Allowable methods of cleaning include using steam, diesel, 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/liter VOC content or less. Steam cleaning shall be allowed at locations where wastewater treatment facilities are limited or during December through March. [District Rule 2080] Federally Enforceable Through Title V Permit
14. Tank pressure/vacuum valve (Varec) shall be inspected on an annual basis. During the varec inspections, the varec can be removed from the tank and replaced if necessary. The permittee shall minimize emissions from the opening by plugging the opening during the removal of varec valve. [District Rule 2080] Federally Enforceable Through Title V Permit
15. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. 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
17. 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

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CONDITIONS CONTINUE ON NEXT PAGE

18. 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
19. 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 99 percent efficient as measured by EPA Method 18 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 99% control efficiency as measured by EPA Method 18 at least annually. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
20. 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
21. True vapor pressure shall be measured at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored using the latest version of the Lawrence Berkeley National Laboratory "Test Method for Vapor Pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rules 2520, 9.3.2 and 4623, 6.2.2] Federally Enforceable Through Title V Permit
22. 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
23. Permittee shall keep accurate records of throughput and TVP of liquids stored in each tank and such records shall be made readily available for District inspection at any time for a time period of five years. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] 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-1135-325-3

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

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

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 3,000 BBL FIXED ROOF CRUDE OIL STORAGE TANK, SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-1135-173 (W & S LEASE): AUTHORIZE RECEIPT OF VEDDER LEASE PRODUCTION

## CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. The tank shall be equipped with a vapor loss prevention system consisting of vapor and condensate collection systems capable of reducing VOC emissions by at least 99%. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Tank shall be designed and maintained to vent only to vapor control system, except during the period of tank cleaning, inspections, and maintenance allowed by this permit. [District NSR Rule] 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-1135-325-3: May 26 2015 7:03AM -- TORID : Joint Inspection NOT Required

5. All tank gauging, hatches, sampling ports, pressure relief valves, vapor control system components, etc. shall be closed and leak-free (as defined in Rule 4623) except during sampling or attended maintenance. Leak-free is a condition without a gas leak or a liquid leak. A gas leak is a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is the dripping of organic liquid at a rate of more than 3 drops per minute. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Tanks seams, welds, joints, piping, valves, and fittings shall be inspected and maintained in a leak-free (as defined in Rule 4623) condition. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The fugitive VOC emissions from this tank and the vapor control system shall not exceed 0.47 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Permittee shall maintain with the permit accurate fugitive component counts for tank and associated vapor control systems and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999) Screening Range emission factors. [District NSR Rule] Federally Enforceable Through Title V Permit
9. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020] Federally Enforceable Through Title V Permit
10. There shall be no throughput during cleaning of this tank. [District Rule 2080] Federally Enforceable Through Title V Permit
11. Prior to opening the tank to allow tank cleaning, the following procedure must be followed: Operate PV valve and vapor control system during emptying, filling, and flushing. During filling and purging, no vapor leakage is allowed. Drain all liquid from the tank to the maximum extent feasible prior to opening the tank. [District Rule 2080] Federally Enforceable Through Title V Permit
12. Prior to opening the tank to allow tank cleaning, one of the following options must be followed: 1) operate the vapor control system for at least 2 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 Rule 2080] Federally Enforceable Through Title V Permit
13. Allowable methods of cleaning include using steam, diesel, 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/liter VOC content or less. Steam cleaning shall be allowed at locations where wastewater treatment facilities are limited or during December through March. [District Rule 2080] Federally Enforceable Through Title V Permit
14. Tank pressure/vacuum valve (Varec) shall be inspected on an annual basis. During the varec inspections, the varec can be removed from the tank and replaced if necessary. The permittee shall minimize emissions from the opening by plugging the opening during the removal of varec valve. [District Rule 2080] Federally Enforceable Through Title V Permit
15. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. 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

CONDITIONS CONTINUE ON NEXT PAGE

17. 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
18. 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
19. 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 99 percent efficient as measured by EPA Method 18 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 99% control efficiency as measured by EPA Method 18 at least annually. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
20. 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
21. 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
22. This unit has a storage capacity less than 420,000 gallons (1,589.874 cubic meters) and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE:** DRAFT

**PERMIT NO:** S-1135-337-3

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

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

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 3,000 BBL (126,000 GALLON) FIXED ROOF STOCK TANK ID# WS-04, CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON S-1135-173 (W&S LEASE): AUTHORIZE RECEIPT OF VEDDER LEASE PRODUCTION

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. The tank shall be equipped with a vapor loss prevention system consisting of vapor and condensate collection systems capable of reducing VOC emissions by at least 99%. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Tank shall be designed and maintained to vent only to vapor control system, except during the period of tank cleaning, inspections, and maintenance allowed by this permit. [District NSR Rule] 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-1135-337-3 - May 26 2015 7:03AM - TORID : Joint Inspection NOT Required

5. All tank gauging, hatches, sampling ports, pressure relief valves, vapor control system components, etc. shall be closed and leak-free (as defined in Rule 4623) except during sampling or attended maintenance. Leak-free is a condition without a gas leak or a liquid leak. A gas leak is a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is the dripping of organic liquid at a rate of more than 3 drops per minute. [District NSR Rule and Rule 4623] Federally Enforceable Through Title V Permit
6. Tanks seams, welds, joints, piping, valves, and fittings shall be inspected and maintained in a leak-free (as defined in Rule 4623) condition. [District NSR Rule and Rule 4623] Federally Enforceable Through Title V Permit
7. The fugitive VOC emissions from this tank and the vapor control system shall not exceed 0.2 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Permittee shall maintain with the permit accurate fugitive component counts for tank and associated vapor control systems and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999) Screening Range emission factors. [District NSR Rule] Federally Enforceable Through Title V Permit
9. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020] Federally Enforceable Through Title V Permit
10. There shall be no throughput during cleaning of this tank. [District Rule 2080] Federally Enforceable Through Title V Permit
11. Prior to opening the tank to allow tank cleaning, the following procedure must be followed: Operate PV valve and vapor control system during emptying, filling, and flushing. During filling and purging, no vapor leakage is allowed. Drain all liquid from the tank to the maximum extent feasible prior to opening the tank. [District Rule 2080] Federally Enforceable Through Title V Permit
12. Prior to opening the tank to allow tank cleaning, one of the following options must be followed: 1) operate the vapor control system for at least 2 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 Rule 2080] Federally Enforceable Through Title V Permit
13. Allowable methods of cleaning include using steam, diesel, 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/liter VOC content or less. Steam cleaning shall be allowed at locations where wastewater treatment facilities are limited or during December through March. [District Rule 2080] Federally Enforceable Through Title V Permit
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15. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. 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

CONDITIONS CONTINUE ON NEXT PAGE

17. 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
18. 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
19. 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 99 percent efficient as measured by EPA Method 18 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 99% control efficiency as measured by EPA Method 18 at least annually. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
20. 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
21. 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
22. This unit has a storage capacity less than 420,000 gallons (1,589.874 cubic meters) and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40 CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
23. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit

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