



JUN 19 2014

Mr. Jerry Frost
Vintage California Production
9600 Ming Ave
Bakersfield, CA 93311

**Re: Notice of Minor Title V Permit Modification
District Facility # S-1326
Project # S1123441, 1131954, and 1141290**

Dear Mr. Frost:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authorities to Construct (ATC) S-1547-287-10, '-287-11, -287-12, and -287-13 into the Title V operating permit. The ATCs authorized increasing the steam enhanced well count to 1085, removing Rule 4401 Inspection and Re-inspection conditions, adding PSD (Rule 2410) requirements, installing two vapor compressor skids, and expanding the TEOR operation into Sections: 22, 24, 25 and 26, Township: 28S, Range: 27E.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authorities to Construct (ATC) S-1547-287-10, '-287-11, -287-12, and -287-13, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Chay Thao, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,



Arnaud Marjollet
Director of Permit Services

Enclosures

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

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

TITLE V APPLICATION REVIEW

Minor Modification

Project #s: 1123441, 1131954, &1141290

Engineer: Steve Davidson

Date: June 17, 2014

Reviewed by ASUPR AQIE

Facility Number: S-1326
Facility Name: Vintage California Production, LLC
Mailing Address: PO Box 9600 Ming Ave
Bakersfield, CA 93311

JUN 18 2014

Contact Name: Jerry Frost
Phone: (661) 869-8179

Responsible Official: Dewayne Smith
Title: Surface Operations Manager

I. PROPOSAL

Vintage California Production, LLC (VCP) is proposing a Title V minor permit modification to incorporate Authority to Construct (ATC) # S-1326-287-10, '-287-11, -287-12, and -287-13 into Vintage's Title V permit. The ATCs authorized the following changes:

- S1326-287-10: Increasing the steam enhanced well count to 1,085, expanding the TEOR operation into Sections: 24, 25 and 26, Township: 28S, Range: 27E, and removing Rule 4401 Inspection and Re-inspection conditions (per exemption Rule 4401, Section 4.7)
- S1326-287-11: Adding PSD (Rule 2410) requirements to permit
- S1326-287-12: Installing two vapor compressor skids
- S1326-287-13: Expanding Thermally Enhanced Oil Recovery (TEOR) operation into Section: 22, Township: 28S, Range: 27E.

Conditions were placed on the permit to ensure the units meet the requirements of District Rules.

II. FACILITY LOCATION

The TEOR operation is located in VPC's Heavy Oil Central Stationary Source, Kern Front Oil Field, Sections 22, 23, 24, 25 and 26, Township: 28S, Range: 27E.

III. EQUIPMENT DESCRIPTION

Authorities To Construct:

- S1326-287-10: MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY OPERATION WITH 305 STEAM ENHANCED PRODUCTION WELLS CONNECTED TO WELL HEAD CASING VENT VAPOR RECOVERY SYSTEM (CVR) VENTING VAPORS TO SECTION 23 TANK VAPOR RECOVERY SYSTEM (S-1326-263): REMOVE RULE 4401 INSPECTION CONDITIONS, ADD 780 WELLS AND EXPAND TEOR OPERATION TO INCLUDE THE FOLLOWING LOCATIONS: SECTION 24, 25 AND 26, TOWNSHIP: 28S, RANGE: 27E
- S1326-287-11: MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY OPERATION WITH 1085 STEAM ENHANCED PRODUCTION WELLS CONNECTED TO WELL HEAD CASING VENT VAPOR RECOVERY SYSTEM (CVR) VENTING VAPORS TO SECTION 23 TANK VAPOR RECOVERY SYSTEM (S-1326-263): ADD RULE 2410 CONDITIONS
- S1326-287-12: MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY OPERATION WITH 1085 STEAM ENHANCED PRODUCTION WELLS CONNECTED TO WELL HEAD CASING VENT VAPOR RECOVERY SYSTEM (CVR) VENTING VAPORS TO SECTION 23 TANK VAPOR RECOVERY SYSTEM (S-1326-263): INSTALL UP TO TWO VAPOR COMPRESSOR SKIDS EACH CONTAINING UP TO 3 COMPRESSORS
- S1326-287-13: MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY OPERATION WITH 1085 STEAM ENHANCED PRODUCTION WELLS CONNECTED TO WELL HEAD CASING VENT VAPOR RECOVERY SYSTEM (CVR) VENTING VAPORS TO SECTION 23 TANK VAPOR RECOVERY SYSTEM (S-1326-263): EXPAND OPERATION TO INCLUDE SEC: 22, TOWNSHIP:28S. RANGE: 27E

Note: ATCs S-1326-287-10 and '-287-11 were issued with a Title V Certificate of Conformity

Post Project Permit to Operate:

S-1326-287-15: THERMALLY ENHANCED OIL RECOVERY OPERATION WITH 1085 STEAM ENHANCED PRODUCTION WELLS CONNECTED TO WELL HEAD CASING VENT VAPOR RECOVERY SYSTEM (CVR) VENTING VAPORS TO SECTION 23 TANK VAPOR RECOVERY SYSTEM (S-1326-263)

IV. SCOPE OF EPA AND PUBLIC REVIEW

These changes to the Title V permit are considered to be Administrative Amendments ('-287-10 and '-11) and Minor Modifications ('-287-12 and '-13) and, as such, they require no public review.

V. APPLICABLE REQUIREMENTS

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

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

The Authority to Construct (ATC) permits from projects authorized increasing the steam enhanced well count to 1,085, removing Rule 4401 Inspection and Re-inspection conditions, adding PSD (Rule 2410) requirements, installing two vapor compressor skids, and expanding the TEOR operation into Sections: 22, 24, 25 and 26, Township: 28S, Range: 27E.

Condition # on Existing PTO S-1326-287-7	Condition # on Propose PTO S-1326-287-14	Condition is New, Modified, or Removed	Reason for Change from Current PTO
--	1	New	Condition identifying the location of the TEOR operation added to the permit.
--	5	New	Condition stating frequency of fluid VOC content testing added to the permit
--	7	New	Condition requiring well vents to be closed and the front line tank to be connected to a vapor control system added to the Permit.
9	11	Modified	Condition allowing TEOR wells to be exempt during repair update to reflect the current rule amendment date.

Condition # on Existing PTO S-1326-287-7	Condition # on Propose PTO S-1326-287-14	Condition is New, Modified, or Removed	Reason for Change from Current PTO
17	--	Removed	Condition stating how a hydrocarbon detection device is operated and calibrated removed from the permit per exemption Rule 4401, Section 4.7.
18	--	Removed	Condition requiring polish rod stuffing boxes to be inspected removed from the permit per exemption Rule 4401, Section 4.7.
--	13	New	Condition defining "leak" added to the permit.
20	17	Modified	Condition requiring leaking components to be placed out of service or tagged, repaired, and re-inspected updated to reflect current District wording.
--	18	New	Condition requiring permittee to report to the District if there is a change in description of major or critical components.
--	19	New	Condition stating permittee is violation if they do not meet the stated controls for open ended lines added to the permit.
--	20	New	Condition stating the permittee is in violation if they exceed the Rule 4401 leak criteria added to the permit
23	--	Removed	Condition stating the possible violations during District inspection removed from the permit
25-31	--	Removed	Inspection and maintenance conditions removed from the permit.
--	31	New	Condition allowing all uncondensed vapors to be incinerated instead of conduction annual source tests to determine control efficiency added to the permit
--	32	New	Condition required each gauge tank to conduct TVP testing and submit the results added to the permit to operate
50	34	Modified	Condition stating method of determining VOC Content updated to current District standard condition.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;

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

Because these permit revisions meet all the above criteria, this is a Minor Modification.

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

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

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit
- B. Authority to Construct
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit

ATTACHMENT A

Proposed Modified Title V Operating Permit #
S-1326-287-15

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1326-287-15

EXPIRATION DATE: 03/31/2016

EQUIPMENT DESCRIPTION:

THERMALLY ENHANCED OIL RECOVERY OPERATION WITH 1085 STEAM ENHANCED PRODUCTION WELLS CONNECTED TO WELL HEAD CASING VENT VAPOR RECOVERY SYSTEM (CVR) VENTING VAPORS TO SECTION 23 TANK VAPOR RECOVERY SYSTEM (S-1326-263)

PERMIT UNIT REQUIREMENTS

1. The TEOR operation shall be located within Sections: 22, 23, 24, 25 and 26, Township: 28S, Range: 27E [District Rule 2201] Federally Enforceable Through Title V Permit
2. Well casing vents shall remain closed, connected to well produced fluids lines, or connected to a well vent VOC collection and control system at all times except during periods of actual service or repair when wells are not producing. [District Rules 2201, 2410, and 4401] Federally Enforceable Through Title V Permit
3. Collected CVR vapor shall be piped to tank vapor recovery system (TVR) serving S-1326-263. [District Rules 2201 and 2410] Federally Enforceable Through Title V Permit
4. VOC content of gas collected by the CVR system shall not exceed 10% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of five years. Permittee may use test results obtained from S-1326-263 to demonstrate compliance. [District NSR Rule and District Rule 4401] Federally Enforceable Through Title V Permit
5. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201 and 4401] Federally Enforceable Through Title V Permit
6. Fluids produced from these steam enhanced wells shall be introduced only to tanks listed on permit S-1326-263 that are vented to an approved vapor collection and control system achieving 99% control. [District Rules 2201 and 2410] Federally Enforceable Through Title V Permit
7. An operator shall not operate a steam-enhanced crude oil production well unless the operator complies with the following requirements: The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401, the well vent may be temporarily opened during periods of attended service or repair of the well provided such activity is done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere, 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 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
8. Steam enhanced production wells covered by this permit shall each have a visible identification number. Field personnel shall be provided with written instructions concerning proper operation and maintenance of these wells. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The crude oil production from wells associated with this permit unit shall not lie within 1000 feet of an air injection well used for in-situ combustion. [District Rule 4407] 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. Total combined fugitive emissions from all components associated with this TEOR operation shall not exceed 0.0 lb VOC/ day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. 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 emission control requirements of District Rule 4401, 5.0 (as amended June 16, 2011). [District Rule 4401] Federally Enforceable Through Title V Permit
12. The operator shall maintain monitoring records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401] Federally Enforceable Through Title V Permit
13. Gas and liquid leaks are as defined in Section 3.20 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
14. A gas leak is defined as the detection of a concentration of total organic compounds, above background (measured in accordance with EPA Method 21) that exceeds the following values: 1) A major gas leak is a detection of greater than 10,000 ppmv as methane; and 2) A minor gas leak is a detection of 400 to 10,000 ppmv as methane for pressure relief devices (PRDs) and 2,000 to 10,000 for components other than PRDs. [District Rule 4401] Federally Enforceable Through Title V Permit
15. A liquid leak is defined as the dripping of VOC-containing liquid. A major liquid leak is a visible mist or a continuous flow of liquid that is not seal lubricant. A minor liquid leak is a liquid leak that is not a major liquid leak and drips liquid at a rate of more than three drops per minute, except for seal lubricant. [District Rule 4401] Federally Enforceable Through Title V Permit
16. Operator shall affix a readily visible tag bearing the date on which a leak is detected. The tag shall remain in place until the leaking component is repaired. [District Rule 4401] Federally Enforceable Through Title V Permit
17. An operator shall not use any component with a leak as defined in Section 3.0 of Rule 4401, or that is found to be in violation of the provisions of Section 5.2.2 of Rule 4401. However, components that were found leaking may be used provided such leaking components 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 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
18. An operator shall comply with the requirements of Section 6.7 of Rule 4401 if there is any change in the description of major components or critical components. [District Rule 4401] Federally Enforceable Through Title V Permit
19. An operator shall be in violation of this rule if any District inspection demonstrates that the following conditions in Section 5.2.2 exist at the facility: Existence of an 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 as defined by Section 5.2.2.1 of Rule 4401 requiring process fluid flow through the open-ended lines. [District Rule 4401] Federally Enforceable Through Title V Permit
20. An operator shall be in violation of this rule if any District inspection demonstrates that one or more of the following conditions exist at the facility: existence of a component with any of the following: a major liquid leak, a gas leak greater than 50,000 ppmv, a minor liquid leak or a minor gas leak in excess of the allowable number of leaks allowed by Table 3 of Rule 4401, or a gas leak greater than 10,000 ppmv up to 50,000 ppmv in excess of the allowable number of leaks allowed by Table 3 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
21. Permittee shall keep all hatches closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401]
22. Permittee shall affix a readily visible weatherproof tag to a leaking component upon detection of the leak. The following information shall be included on the tag: 1) the date and time of leak detection; 2) the date and time of leak measurement; 3) leak concentration in ppmv for a gaseous leak; 4) description of whether it is a major liquid leak or a minor liquid leak; and 5) whether the component is an essential component, an unsafe-to-monitor component, or a critical component. [District Rule 4401] 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. Permittee shall keep the tag affixed to the component until all of the following conditions have been met: 1) the leaking component has been repaired or replaced, and 2) the component has been re-inspected using the test methods described in this permit; and 3) the component is found to be in compliance with the requirements of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
24. Permittee 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] Federally Enforceable Through Title V Permit
25. Except for leaking critical components or leaking essential components, if the operator has minimized a leak but the leak still exceeds the applicable leak limits, the operator shall comply with at least one of the following requirements as soon as practicable but not later than the time period specified in Table 4 of Rule 4401: 1) repair or replace the leaking component; 2) vent the leaking component to a VOC collection and control system; or 3) remove the leaking component from operation. [District Rule 4401] Federally Enforceable Through Title V Permit
26. The leak rate, measured after leak minimization has been performed, shall be used to determine the applicable repair period specified in Table 4 of Rule 4401 and the time of initial leak detection shall be the start of the repair period specified in Table 4 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
27. 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] Federally Enforceable Through Title V Permit
28. Flanges shall be monitored with a portable hydrocarbon detection instrument along the entire circumference of the flange-gasket interface. Threaded connections, tubing fittings, and other types of non-permanent joints shall be monitored along the entire circumference of joint interface. [District Rule 2201] Federally Enforceable Through Title V Permit
29. Valves shall be monitored with a portable hydrocarbon detection instrument where the stem comes through the packing gland, and at any attached or connected body flange(s), bonnet flange(s), or plug(s). [District Rule 2201] Federally Enforceable Through Title V Permit
30. All other components such as diaphragms, dump arms, instruments, meters shall be monitored at all points of possible emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
31. In lieu of conducting annual source tests of 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, all uncondensed VOC emissions collected by a vapor collection and control system shall be incinerated in fuel burning equipment, an internal combustion engine or in a smokeless flare. [District Rule 4401] Federally Enforceable Through Title V Permit
32. An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.0 of Rule 4401: 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] Federally Enforceable Through Title V Permit
33. The control efficiency of the vapor collection and control system used to control VOC emissions from steam enhanced crude oil production well shall be determined by mass balance based on most stringent of a source test, USEPA approved emission factors, or Air Pollution (AP)-42 emission factors for components and number of components; and the efficiency of destruction devices determined by USEPA Method 25, 25a, or 25b as applicable. [District Rule 4401] 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.

34. 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. Halogenated exempt compounds shall be determined by CARB Method 432. [District Rule 4401] Federally Enforceable Through Title V Permit
35. 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] Federally Enforceable Through Title V Permit
36. 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] Federally Enforceable Through Title V Permit
37. 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] Federally Enforceable Through Title V Permit
38. Permittee shall maintain a copy of the latest APCO-approved Operator Management Plan (OMP) at the facility and make it available to the APCO, ARB, and US EPA upon request. [District Rule 4401] Federally Enforceable Through Title V Permit
39. By January 30 of each year, permittee shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4401] Federally Enforceable Through Title V Permit
40. Permittee shall maintain a current list of all steam enhanced wells authorized by this permit and shall update the list whenever a well is added, replaced, or deleted. [District Rule 2201] Federally Enforceable Through Title V Permit
41. Permittee shall maintain an accurate component count for the well vent collection and control system serving this operation, in accordance with CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors. Permittee shall update such records when new components are installed. [District Rule 2201] Federally Enforceable Through Title V Permit
42. All records required by this permit shall be maintained and retained on-site for a minimum of five (5) years and made available for District, ARB, and EPA inspection upon request. [District Rule 4401] Federally Enforceable Through Title V Permit

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

ATTACHMENT B

Authority to Construct #
S-1547-287-10, '-287-11, -287-12, and -287-13



AUTHORITY TO CONSTRUCT

PERMIT NO: S-1326-287-10

ISSUANCE DATE: 08/14/2012

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

LOCATION: HEAVY OIL CENTRAL STATIONARY SOURCE
KERN COUNTY, CA

EQUIPMENT DESCRIPTION:

MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY OPERATION WITH 305 STEAM ENHANCED PRODUCTION WELLS CONNECTED TO WELL HEAD CASING VENT VAPOR RECOVERY SYSTEM (CVR) VENTING VAPORS TO SECTION 23 TANK VAPOR RECOVERY SYSTEM (S-1326-263): REMOVE RULE 4401 INSPECTION CONDITIONS, ADD 780 WELLS AND EXPAND TEOR OPERATION TO INCLUDE THE FOLLOWING LOCATIONS: SECTION 24, 25 AND 26, TOWNSHIP: 28S, RANGE: 27E

CONDITIONS

1. 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. 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 TEOR operation shall be located within Sections: 23, 24, 25 and 26, Township: 28S, Range: 27E [District Rule 2201] Federally Enforceable Through Title V Permit
4. Well casing vents shall remain closed, connected to well produced fluids lines, or connected to a well vent VOC collection and control system at all times except during periods of actual service or repair when wells are not producing. [District NSR Rule and District Rule 4401] Federally Enforceable Through Title V Permit
5. Collected CVR vapor shall be piped to tank vapor recovery system (TVR) serving S-1326-263. [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.

Sayed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

S-1326-287-10: Aug 14 2012 9:18AM - DAVIDSOS : Joint Inspection NOT Required

6. VOC content of gas collected by the CVR system shall not exceed 10% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of five years. Permittee may use test results obtained from S-1326-263 to demonstrate compliance. [District NSR Rule and District Rule 4401] Federally Enforceable Through Title V Permit
7. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201 and 4401] Federally Enforceable Through Title V Permit
8. Fluids produced from these steam enhanced wells shall be introduced only to tanks listed on permit S-1326-263 that are vented to an approved vapor collection and control system achieving 99% control. [District NSR Rule] Federally Enforceable Through Title V Permit
9. An operator shall not operate a steam-enhanced crude oil production well unless the operator complies with the following requirements: The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401, the well vent may be temporarily opened during periods of attended service or repair of the well provided such activity is done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere, 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 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
10. Steam enhanced production wells covered by this permit shall each have a visible identification number. Field personnel shall be provided with written instructions concerning proper operation and maintenance of these wells. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The crude oil production from wells associated with this permit unit shall not lie within 1000 feet of an air injection well used for in-situ combustion. [District Rule 4407] Federally Enforceable Through Title V Permit
12. Total combined fugitive emissions from all components associated with this TEOR operation shall not exceed 0.0 lb VOC/ day. [District NSR Rule] Federally Enforceable Through Title V Permit
13. 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 emission control requirements of District Rule 4401, 5.0 (as amended June 16, 2011). [District Rule 4401] Federally Enforceable Through Title V Permit
14. The operator shall maintain monitoring records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401] Federally Enforceable Through Title V Permit
15. Gas and liquid leaks are as defined in Section 3.20 of Rule 4401. [District Rule] Federally Enforceable Through Title V Permit
16. A gas leak is defined as the detection of a concentration of total organic compounds, above background (measured in accordance with EPA Method 21) that exceeds the following values: 1) A major gas leak is a detection of greater than 10,000 ppmv as methane; and 2) A minor gas leak is a detection of 400 to 10,000 ppmv as methane for pressure relief devices (PRDs) and 2,000 to 10,000 for components other than PRDs. [District Rule 4401] Federally Enforceable Through Title V Permit
17. A liquid leak is defined as the dripping of VOC-containing liquid. A major liquid leak is a visible mist or a continuous flow of liquid that is not seal lubricant. A minor liquid leak is a liquid leak that is not a major liquid leak and drips liquid at a rate of more than three drops per minute, except for seal lubricant. [District Rule 4401] Federally Enforceable Through Title V Permit
18. Operator shall affix a readily visible tag bearing the date on which a leak is detected. The tag shall remain in place until the leaking component is repaired. [District Rule 4401] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. An operator shall not use any component with a leak as defined in Section 3.0 of Rule 4401, or that is found to be in violation of the provisions of Section 5.2.2 of Rule 4401. However, components that were found leaking may be used provided such leaking components 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 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
20. An operator shall comply with the requirements of Section 6.7 of Rule 4401 if there is any change in the description of major components or critical components. [District Rule 4401] Federally Enforceable Through Title V Permit
21. An operator shall be in violation of this rule if any District inspection demonstrates that the following conditions in Section 5.2.2 exist at the facility: Existence of an 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 as defined by Section 5.2.2.1 of Rule 4401 requiring process fluid flow through the open-ended lines. [District Rule 4401] Federally Enforceable Through Title V Permit
22. An operator shall be in violation of this rule if any District inspection demonstrates that one or more of the following conditions exist at the facility: existence of a component with any of the following: a major liquid leak, a gas leak greater than 50,000 ppmv, a minor liquid leak or a minor gas leak in excess of the allowable number of leaks allowed by Table 3 of Rule 4401, or a gas leak greater than 10,000 ppmv up to 50,000 ppmv in excess of the allowable number of leaks allowed by Table 3 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
23. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401] Federally Enforceable Through Title V Permit
24. Permittee shall affix a readily visible weatherproof tag to a leaking component upon detection of the leak. The following information shall be included on the tag: 1) the date and time of leak detection; 2) the date and time of leak measurement; 3) leak concentration in ppmv for a gaseous leak; 4) description of whether it is a major liquid leak or a minor liquid leak; and 5) whether the component is an essential component, an unsafe-to-monitor component, or a critical component. [District Rule 4401] Federally Enforceable Through Title V Permit
25. Permittee shall keep the tag affixed to the component until all of the following conditions have been met: 1) the leaking component has been repaired or replaced, and 2) the component has been re-inspected using the test methods described in this permit; and 3) the component is found to be in compliance with the requirements of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
26. Permittee 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] Federally Enforceable Through Title V Permit
27. Except for leaking critical components or leaking essential components, if the operator has minimized a leak but the leak still exceeds the applicable leak limits, the operator shall comply with at least one of the following requirements as soon as practicable but not later than the time period specified in Table 4 of Rule 4401: 1) repair or replace the leaking component; 2) vent the leaking component to a VOC collection and control system; or 3) remove the leaking component from operation. [District Rule 4401] Federally Enforceable Through Title V Permit
28. The leak rate, measured after leak minimization has been performed, shall be used to determine the applicable repair period specified in Table 4 of Rule 4401 and the time of initial leak detection shall be the start of the repair period specified in Table 4 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
29. 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] Federally Enforceable Through Title V Permit
30. Flanges shall be monitored with a portable hydrocarbon detection instrument along the entire circumference of the flange-gasket interface. Threaded connections, tubing fittings, and other types of non-permanent joints shall be monitored along the entire circumference of joint interface. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

31. Valves shall be monitored with a portable hydrocarbon detection instrument where the stem comes through the packing gland, and at any attached or connected body flange(s), bonnet flange(s), or plug(s). [District NSR Rule] Federally Enforceable Through Title V Permit
32. All other components such as diaphragms, dump arms, instruments, meters shall be monitored at all points of possible emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
33. In lieu of conducting annual source tests of 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, all uncondensed VOC emissions collected by a vapor collection and control system shall be incinerated in fuel burning equipment, an internal combustion engine or in a smokeless flare. [District Rule 4401] Federally Enforceable Through Title V Permit
34. An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.0 of Rule 4401: 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] Federally Enforceable Through Title V Permit
35. The control efficiency of the vapor collection and control system used to control VOC emissions from steam enhanced crude oil production well shall be determined by mass balance based on most stringent of a source test, USEPA approved emission factors, or Air Pollution (AP)-42 emission factors for components and number of components; and the efficiency of destruction devices determined by USEPA Method 25, 25a, or 25b as applicable. [District Rule 4401] Federally Enforceable Through Title V Permit
36. 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. Halogenated exempt compounds shall be determined by CARB Method 432. [District Rule 4401] Federally Enforceable Through Title V Permit
37. 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] Federally Enforceable Through Title V Permit
38. 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] Federally Enforceable Through Title V Permit
39. 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] Federally Enforceable Through Title V Permit
40. Permittee shall maintain a copy of the latest APCO-approved Operator Management Plan (OMP) at the facility and make it available to the APCO, ARB, and US EPA upon request. [District Rule 4401] Federally Enforceable Through Title V Permit
41. By January 30 of each year, permittee shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4401] Federally Enforceable Through Title V Permit
42. Permittee shall maintain a current list of all steam enhanced wells authorized by this permit and shall update the list whenever a well is added, replaced, or deleted. [District NSR Rule] Federally Enforceable Through Title V Permit
43. Permittee shall maintain an accurate component count for the well vent collection and control system serving this operation, in accordance with CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors. Permittee shall update such records when new components are installed. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

44. All records required by this permit shall be maintained and retained on-site for a minimum of five (5) years and made available for District, ARB, and EPA inspection upon request. [District Rule 4401] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: S-1326-287-11

ISSUANCE DATE: 04/23/2013

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

LOCATION: HEAVY OIL CENTRAL STATIONARY SOURCE
KERN COUNTY, CA

SECTION: SW23 **TOWNSHIP:** 28S **RANGE:** 27E

EQUIPMENT DESCRIPTION:

MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY OPERATION WITH 1085 STEAM ENHANCED PRODUCTION WELLS CONNECTED TO WELL HEAD CASING VENT VAPOR RECOVERY SYSTEM (CVR) VENTING VAPORS TO SECTION 23 TANK VAPOR RECOVERY SYSTEM (S-1326-263); ADD RULE 2410 CONDITIONS

CONDITIONS

1. 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. 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. Authority to Construct (ATC) S-1326-287-10 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The TEOR operation shall be located within Sections: 23, 24, 25 and 26, Township: 28S, Range: 27E [District Rule 2201] Federally Enforceable Through Title V Permit
5. Well casing vents shall remain closed, connected to well produced fluids lines, or connected to a well vent VOC collection and control system at all times except during periods of actual service or repair when wells are not producing. [District Rules 2201, 2410, and 4401] Federally Enforceable Through Title V Permit
6. Collected CVR vapor shall be piped to tank vapor recovery system (TVR) serving S-1326-263. [District Rules 2201 and 2410] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO



DAVID WARNER, Director of Permit Services
S-1326-287-11 Apr 23 2013 1:56PM - RICKARDK : Job Inspection NOT Required

7. VOC content of gas collected by the CVR system shall not exceed 10% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of five years. Permittee may use test results obtained from S-1326-263 to demonstrate compliance. [District Rules 2201 and 4401] Federally Enforceable Through Title V Permit
8. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rules 2201 and 4401] Federally Enforceable Through Title V Permit
9. Fluids produced from these steam enhanced wells shall be introduced only to tanks listed on permit S-1326-263 that are vented to an approved vapor collection and control system achieving 99% control. [District Rules 2201 and 2410] Federally Enforceable Through Title V Permit
10. An operator shall not operate a steam-enhanced crude oil production well unless the operator complies with the following requirements: The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401, the well vent may be temporarily opened during periods of attended service or repair of the well provided such activity is done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere, 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 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
11. Steam enhanced production wells covered by this permit shall each have a visible identification number. Field personnel shall be provided with written instructions concerning proper operation and maintenance of these wells. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The crude oil production from wells associated with this permit unit shall not lie within 1000 feet of an air injection well used for in-situ combustion. [District Rule 4407] Federally Enforceable Through Title V Permit
13. Total combined fugitive emissions from all components associated with this TEOR operation shall not exceed 0.0 lb VOC/ day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. 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 emission control requirements of District Rule 4401, 5.0 (as amended June 16, 2011). [District Rule 4401] Federally Enforceable Through Title V Permit
15. Gas and liquid leaks are as defined in Section 3.20 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
16. A gas leak is defined as the detection of a concentration of total organic compounds, above background (measured in accordance with EPA Method 21) that exceeds the following values: 1) A major gas leak is a detection of greater than 10,000 ppmv as methane; and 2) A minor gas leak is a detection of 400 to 10,000 ppmv as methane for pressure relief devices (PRDs) and 2,000 to 10,000 for components other than PRDs. [District Rule 4401] Federally Enforceable Through Title V Permit
17. A liquid leak is defined as the dripping of VOC-containing liquid. A major liquid leak is a visible mist or a continuous flow of liquid that is not seal lubricant. A minor liquid leak is a liquid leak that is not a major liquid leak and drips liquid at a rate of more than three drops per minute, except for seal lubricant. [District Rule 4401] Federally Enforceable Through Title V Permit
18. Operator shall affix a readily visible tag bearing the date on which a leak is detected. The tag shall remain in place until the leaking component is repaired. [District Rule 4401] Federally Enforceable Through Title V Permit
19. An operator shall not use any component with a leak as defined in Section 3.0 of Rule 4401, or that is found to be in violation of the provisions of Section 5.2.2 of Rule 4401. However, components that were found leaking may be used provided such leaking components 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 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. An operator shall comply with the requirements of Section 6.7 of Rule 4401 if there is any change in the description of major components or critical components. [District Rule 4401] Federally Enforceable Through Title V Permit
21. An operator shall be in violation of this rule if any District inspection demonstrates that the following conditions in Section 5.2.2 exist at the facility: Existence of an 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 as defined by Section 5.2.2.1 of Rule 4401 requiring process fluid flow through the open-ended lines. [District Rule 4401] 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 a 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] Federally Enforceable Through Title V Permit
23. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401] Federally Enforceable Through Title V Permit
24. Permittee shall affix a readily visible weatherproof tag to a leaking component upon detection of the leak. The following information shall be included on the tag: 1) the date and time of leak detection; 2) the date and time of leak measurement; 3) leak concentration in ppmv for a gaseous leak; 4) description of whether it is a major liquid leak or a minor liquid leak; and 5) whether the component is an essential component, an unsafe-to-monitor component, or a critical component. [District Rule 4401] Federally Enforceable Through Title V Permit
25. Permittee shall keep the tag affixed to the component until all of the following conditions have been met: 1) the leaking component has been repaired or replaced, and 2) the component has been re-inspected using the test methods described in this permit; and 3) the component is found to be in compliance with the requirements of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
26. Permittee 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] Federally Enforceable Through Title V Permit
27. Except for leaking critical components or leaking essential components, if the operator has minimized a leak but the leak still exceeds the applicable leak limits, the operator shall comply with at least one of the following requirements as soon as practicable but not later than the time period specified in Table 4 of Rule 4401: 1) repair or replace the leaking component; 2) vent the leaking component to a VOC collection and control system; or 3) remove the leaking component from operation. [District Rule 4401] Federally Enforceable Through Title V Permit
28. The leak rate, measured after leak minimization has been performed, shall be used to determine the applicable repair period specified in Table 4 of Rule 4401 and the time of initial leak detection shall be the start of the repair period specified in Table 4 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
29. 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] Federally Enforceable Through Title V Permit
30. Flanges shall be monitored with a portable hydrocarbon detection instrument along the entire circumference of the flange-gasket interface. Threaded connections, tubing fittings, and other types of non-permanent joints shall be monitored along the entire circumference of joint interface. [District Rule 2201] Federally Enforceable Through Title V Permit
31. Valves shall be monitored with a portable hydrocarbon detection instrument where the stem comes through the packing gland, and at any attached or connected body flange(s), bonnet flange(s), or plug(s). [District Rule 2201] Federally Enforceable Through Title V Permit
32. All other components such as diaphragms, dump arms, instruments, meters shall be monitored at all points of possible emissions. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

33. In lieu of conducting annual source tests of 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, all uncondensed VOC emissions collected by a vapor collection and control system shall be incinerated in fuel burning equipment, an internal combustion engine or in a smokeless flare. [District Rule 4401] Federally Enforceable Through Title V Permit
34. An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.0 of Rule 4401: 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] Federally Enforceable Through Title V Permit
35. The control efficiency of the vapor collection and control system used to control VOC emissions from steam enhanced crude oil production well shall be determined by mass balance based on most stringent of a source test, USEPA approved emission factors, or Air Pollution (AP)-42 emission factors for components and number of components; and the efficiency of destruction devices determined by USEPA Method 25, 25a, or 25b as applicable. [District Rule 4401] Federally Enforceable Through Title V Permit
36. 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. Halogenated exempt compounds shall be determined by CARB Method 432. [District Rule 4401] Federally Enforceable Through Title V Permit
37. 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] Federally Enforceable Through Title V Permit
38. 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] Federally Enforceable Through Title V Permit
39. 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] Federally Enforceable Through Title V Permit
40. Permittee shall maintain a copy of the latest APCO-approved Operator Management Plan (OMP) at the facility and make it available to the APCO, ARB, and US EPA upon request. [District Rule 4401] Federally Enforceable Through Title V Permit
41. By January 30 of each year, permittee shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4401] Federally Enforceable Through Title V Permit
42. Permittee shall maintain a current list of all steam enhanced wells authorized by this permit and shall update the list whenever a well is added, replaced, or deleted. [District Rule 2201] Federally Enforceable Through Title V Permit
43. The operator shall maintain monitoring records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401] Federally Enforceable Through Title V Permit
44. Permittee shall maintain an accurate component count for the well vent collection and control system serving this operation, in accordance with CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors. Permittee shall update such records when new components are installed. [District Rule 2201] Federally Enforceable Through Title V Permit
45. All records required by this permit shall be maintained and retained on-site for a minimum of five (5) years and made available for District, ARB, and EPA inspection upon request. [District Rule 4401] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: S-1326-287-12

ISSUANCE DATE: 05/06/2013

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

LOCATION: HEAVY OIL CENTRAL STATIONARY SOURCE
KERN COUNTY, CA

SECTION: SW23 **TOWNSHIP:** 28S **RANGE:** 27E

EQUIPMENT DESCRIPTION:

MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY OPERATION WITH 1085 STEAM ENHANCED PRODUCTION WELLS CONNECTED TO WELL HEAD CASING VENT VAPOR RECOVERY SYSTEM (CVR) VENTING VAPORS TO SECTION 23 TANK VAPOR RECOVERY SYSTEM (S-1326-263); INSTALL UP TO TWO VAPOR COMPRESSOR SKIDS EACH CONTAINING UP TO 3 COMPRESSORS

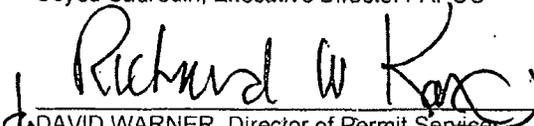
CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. The TEOR operation shall be located within Sections: 23, 24, 25 and 26, Township: 28S, Range: 27E [District Rule 2201] Federally Enforceable Through Title V Permit
3. Well casing vents shall remain closed, connected to well produced fluids lines, or connected to a well vent VOC collection and control system at all times except during periods of actual service or repair when wells are not producing. [District NSR Rule and District Rule 4401] Federally Enforceable Through Title V Permit
4. Collected CVR vapor shall be piped to tank vapor recovery system (TVR) serving S-1326-263. [District NSR Rule] Federally Enforceable Through Title V Permit
5. VOC content of gas collected by the CVR system shall not exceed 10% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of five years. Permittee may use test results obtained from S-1326-263 to demonstrate compliance. [District NSR Rule and District Rule 4401] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO



DAVID WARNER, Director of Permit Services
S-1326-287-12 - May 6 2013 10:15AM - EDGHEILR : Joint Inspection NOT Required

6. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201 and 4401] Federally Enforceable Through Title V Permit
7. Fluids produced from these steam enhanced wells shall be introduced only to tanks listed on permit S-1326-263 that are vented to an approved vapor collection and control system achieving 99% control. [District NSR Rule] Federally Enforceable Through Title V Permit
8. An operator shall not operate a steam-enhanced crude oil production well unless the operator complies with the following requirements: The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401, the well vent may be temporarily opened during periods of attended service or repair of the well provided such activity is done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere, 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 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
9. Steam enhanced production wells covered by this permit shall each have a visible identification number. Field personnel shall be provided with written instructions concerning proper operation and maintenance of these wells. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The crude oil production from wells associated with this permit unit shall not lie within 1000 feet of an air injection well used for in-situ combustion. [District Rule 4407] Federally Enforceable Through Title V Permit
11. Total combined fugitive emissions from all components associated with this TEOR operation shall not exceed 0.0 lb VOC/ day. [District NSR Rule] Federally Enforceable Through Title V Permit
12. 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 emission control requirements of District Rule 4401, 5.0 (as amended June 16, 2011). [District Rule 4401] Federally Enforceable Through Title V Permit
13. The operator shall maintain monitoring records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401] Federally Enforceable Through Title V Permit
14. Gas and liquid leaks are as defined in Section 3.20 of Rule 4401. [District Rule] Federally Enforceable Through Title V Permit
15. A gas leak is defined as the detection of a concentration of total organic compounds, above background (measured in accordance with EPA Method 21) that exceeds the following values: 1) A major gas leak is a detection of greater than 10,000 ppmv as methane; and 2) A minor gas leak is a detection of 400 to 10,000 ppmv as methane for pressure relief devices (PRDs) and 2,000 to 10,000 for components other than PRDs. [District Rule 4401] Federally Enforceable Through Title V Permit
16. A liquid leak is defined as the dripping of VOC-containing liquid. A major liquid leak is a visible mist or a continuous flow of liquid that is not seal lubricant. A minor liquid leak is a liquid leak that is not a major liquid leak and drips liquid at a rate of more than three drops per minute, except for seal lubricant. [District Rule 4401] Federally Enforceable Through Title V Permit
17. Operator shall affix a readily visible tag bearing the date on which a leak is detected. The tag shall remain in place until the leaking component is repaired. [District Rule 4401] Federally Enforceable Through Title V Permit
18. An operator shall not use any component with a leak as defined in Section 3.0 of Rule 4401, or that is found to be in violation of the provisions of Section 5.2.2 of Rule 4401. However, components that were found leaking may be used provided such leaking components 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 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
19. An operator shall comply with the requirements of Section 6.7 of Rule 4401 if there is any change in the description of major components or critical components. [District Rule 4401] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. An operator shall be in violation of this rule if any District inspection demonstrates that the following conditions in Section 5.2.2 exist at the facility: Existence of an 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 as defined by Section 5.2.2.1 of Rule 4401 requiring process fluid flow through the open-ended lines. [District Rule 4401] Federally Enforceable Through Title V Permit
21. An operator shall be in violation of this rule if any District inspection demonstrates that one or more of the following conditions exist at the facility: existence of a component with any of the following: a major liquid leak, a gas leak greater than 50,000 ppmv, a minor liquid leak or a minor gas leak in excess of the allowable number of leaks allowed by Table 3 of Rule 4401, or a gas leak greater than 10,000 ppmv up to 50,000 ppmv in excess of the allowable number of leaks allowed by Table 3 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
22. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401] Federally Enforceable Through Title V Permit
23. Permittee shall affix a readily visible weatherproof tag to a leaking component upon detection of the leak. The following information shall be included on the tag: 1) the date and time of leak detection; 2) the date and time of leak measurement; 3) leak concentration in ppmv for a gaseous leak; 4) description of whether it is a major liquid leak or a minor liquid leak; and 5) whether the component is an essential component, an unsafe-to-monitor component, or a critical component. [District Rule 4401] Federally Enforceable Through Title V Permit
24. Permittee shall keep the tag affixed to the component until all of the following conditions have been met: 1) the leaking component has been repaired or replaced, and 2) the component has been re-inspected using the test methods described in this permit; and 3) the component is found to be in compliance with the requirements of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
25. Permittee 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] Federally Enforceable Through Title V Permit
26. Except for leaking critical components or leaking essential components, if the operator has minimized a leak but the leak still exceeds the applicable leak limits, the operator shall comply with at least one of the following requirements as soon as practicable but not later than the time period specified in Table 4 of Rule 4401: 1) repair or replace the leaking component; 2) vent the leaking component to a VOC collection and control system; or 3) remove the leaking component from operation. [District Rule 4401] Federally Enforceable Through Title V Permit
27. The leak rate, measured after leak minimization has been performed, shall be used to determine the applicable repair period specified in Table 4 of Rule 4401 and the time of initial leak detection shall be the start of the repair period specified in Table 4 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
28. 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] Federally Enforceable Through Title V Permit
29. Flanges shall be monitored with a portable hydrocarbon detection instrument along the entire circumference of the flange-gasket interface. Threaded connections, tubing fittings, and other types of non-permanent joints shall be monitored along the entire circumference of joint interface. [District NSR Rule] Federally Enforceable Through Title V Permit
30. Valves shall be monitored with a portable hydrocarbon detection instrument where the stem comes through the packing gland, and at any attached or connected body flange(s), bonnet flange(s), or plug(s). [District NSR Rule] Federally Enforceable Through Title V Permit
31. All other components such as diaphragms, dump arms, instruments, meters shall be monitored at all points of possible emissions. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

32. In lieu of conducting annual source tests of 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, all uncondensed VOC emissions collected by a vapor collection and control system shall be incinerated in fuel burning equipment, an internal combustion engine or in a smokeless flare. [District Rule 4401] Federally Enforceable Through Title V Permit
33. An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.0 of Rule 4401: 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] Federally Enforceable Through Title V Permit
34. The control efficiency of the vapor collection and control system used to control VOC emissions from steam enhanced crude oil production well shall be determined by mass balance based on most stringent of a source test, USEPA approved emission factors, or Air Pollution (AP)-42 emission factors for components and number of components; and the efficiency of destruction devices determined by USEPA Method 25, 25a, or 25b as applicable. [District Rule 4401] Federally Enforceable Through Title V Permit
35. 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 E 168, E169 or E260 for liquids. Halogenated exempt compounds shall be determined by CARB Method 432. [District Rule 4401] Federally Enforceable Through Title V Permit
36. 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] Federally Enforceable Through Title V Permit
37. 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] Federally Enforceable Through Title V Permit
38. 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] Federally Enforceable Through Title V Permit
39. Permittee shall maintain a copy of the latest APCO-approved Operator Management Plan (OMP) at the facility and make it available to the APCO, ARB, and US EPA upon request. [District Rule 4401] Federally Enforceable Through Title V Permit
40. By January 30 of each year, permittee shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4401] Federally Enforceable Through Title V Permit
41. Permittee shall maintain a current list of all steam enhanced wells authorized by this permit and shall update the list whenever a well is added, replaced, or deleted. [District NSR Rule] Federally Enforceable Through Title V Permit
42. Permittee shall maintain an accurate component count for the well vent collection and control system serving this operation, in accordance with CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors. Permittee shall update such records when new components are installed. [District NSR Rule] Federally Enforceable Through Title V Permit
43. All records required by this permit shall be maintained and retained on-site for a minimum of five (5) years and made available for District, ARB, and EPA inspection upon request. [District Rule 4401] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: S-1326-287-13

ISSUANCE DATE: 03/11/2014

LEGAL OWNER OR OPERATOR: VINTAGE PRODUCTION CALIFORNIA LLC

MAILING ADDRESS: 9600 MING AVE, SUITE 300
BAKERSFIELD, CA 93311

LOCATION: HEAVY OIL CENTRAL STATIONARY SOURCE
KERN COUNTY, CA

SECTION: SW23 **TOWNSHIP:** 28S **RANGE:** 27E

EQUIPMENT DESCRIPTION:

MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY OPERATION WITH 1085 STEAM ENHANCED PRODUCTION WELLS CONNECTED TO WELL HEAD CASING VENT VAPOR RECOVERY SYSTEM (CVR) VENTING VAPORS TO SECTION 23 TANK VAPOR RECOVERY SYSTEM (S-1326-263); EXPAND OPERATION TO INCLUDE SEC: 22, TOWNSHIP:28S. RANGE: 27E

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. The TEOR operation shall be located within Sections: 22, 23, 24, 25 and 26, Township: 28S, Range: 27E [District Rule 2201] Federally Enforceable Through Title V Permit
3. Well casing vents shall remain closed, connected to well produced fluids lines, or connected to a well vent VOC collection and control system at all times except during periods of actual service or repair when wells are not producing. [District NSR Rule and District Rule 4401] Federally Enforceable Through Title V Permit
4. Collected CVR vapor shall be piped to tank vapor recovery system (TVR) serving S-1326-263. [District NSR Rule] Federally Enforceable Through Title V Permit
5. VOC content of gas collected by the CVR system shall not exceed 10% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of five years. Permittee may use test results obtained from S-1326-263 to demonstrate compliance. [District NSR Rule and District Rule 4401] 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

COPY

Arnaud Marjollet, Director of Permit Services

S-1326-287-13 : Jun 17 2014 8:01AM - DAVIDSOS : Joint Inspection NOT Required

6. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201 and 4401] Federally Enforceable Through Title V Permit
7. Fluids produced from these steam enhanced wells shall be introduced only to tanks listed on permit S-1326-263 that are vented to an approved vapor collection and control system achieving 99% control. [District Rule 2201] Federally Enforceable Through Title V Permit
8. An operator shall not operate a steam-enhanced crude oil production well unless the operator complies with the following requirements: The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401, the well vent may be temporarily opened during periods of attended service or repair of the well provided such activity is done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere, 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 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
9. Steam enhanced production wells covered by this permit shall each have a visible identification number. Field personnel shall be provided with written instructions concerning proper operation and maintenance of these wells. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The crude oil production from wells associated with this permit unit shall not lie within 1000 feet of an air injection well used for in-situ combustion. [District Rule 4407] Federally Enforceable Through Title V Permit
11. Total combined fugitive emissions from all components associated with this TEOR operation shall not exceed 0.0 lb VOC/ day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. 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 emission control requirements of District Rule 4401, 5.0 (as amended June 16, 2011). [District Rule 4401] Federally Enforceable Through Title V Permit
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18. An operator shall not use any component with a leak as defined in Section 3.0 of Rule 4401, or that is found to be in violation of the provisions of Section 5.2.2 of Rule 4401. However, components that were found leaking may be used provided such leaking components 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 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
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20. An operator shall be in violation of this rule if any District inspection demonstrates that the following conditions in Section 5.2.2 exist at the facility: Existence of an 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 as defined by Section 5.2.2.1 of Rule 4401 requiring process fluid flow through the open-ended lines. [District Rule 4401] Federally Enforceable Through Title V Permit
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22. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401] Federally Enforceable Through Title V Permit
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29. Flanges shall be monitored with a portable hydrocarbon detection instrument along the entire circumference of the flange-gasket interface. Threaded connections, tubing fittings, and other types of non-permanent joints shall be monitored along the entire circumference of joint interface. [District Rule 2201] Federally Enforceable Through Title V Permit
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31. All other components such as diaphragms, dump arms, instruments, meters shall be monitored at all points of possible emissions. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

32. In lieu of conducting annual source tests of 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, all uncondensed VOC emissions collected by a vapor collection and control system shall be incinerated in fuel burning equipment, an internal combustion engine or in a smokeless flare. [District Rule 4401] Federally Enforceable Through Title V Permit
33. An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.0 of Rule 4401: 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] Federally Enforceable Through Title V Permit
34. The control efficiency of the vapor collection and control system used to control VOC emissions from steam enhanced crude oil production well shall be determined by mass balance based on most stringent of a source test, USEPA approved emission factors, or Air Pollution (AP)-42 emission factors for components and number of components; and the efficiency of destruction devices determined by USEPA Method 25, 25a, or 25b as applicable. [District Rule 4401] Federally Enforceable Through Title V Permit
35. 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. Halogenated exempt compounds shall be determined by CARB Method 432. [District Rule 4401] Federally Enforceable Through Title V Permit
36. 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] Federally Enforceable Through Title V Permit
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43. All records required by this permit shall be maintained and retained on-site for a minimum of five (5) years and made available for District, ARB, and EPA inspection upon request. [District Rule 4401] Federally Enforceable Through Title V Permit
44. ATC S-1326-287-12 shall be implemented prior to or concurrent with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
S-1326-287-10	0	0	0	0	0
S-1326-287-11	0	0	0	0	0
S-1326-287-12	0	0	0	0	0
S-1326-287-13	0	0	0	0	0
Total	0	0	0	0	0

ATTACHMENT D

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

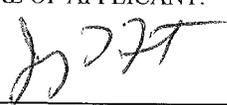
RECEIVED

SEP 04 2012

SJVAPCD
Southern Region

Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">Vintage Production California, LLC</p>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>9600 Ming Ave.</u> CITY: <u>Bakersfield</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93311</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: _____ CITY: _____ <u>23</u> ¼ SECTION <u>28S</u> TOWNSHIP <u>27E</u> RANGE _____	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: Oil & Gas Production	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Implement the following ATC into Title V Operating Permit as an Administrative Amendment: S-1326-287-10	
6. TYPE OR PRINT NAME OF APPLICANT: Jerry L. Frost	TITLE OF APPLICANT: HES Advisor
7. SIGNATURE OF APPLICANT: 	DATE: <u>8-30-12</u> PHONE: (661) 869-8179 FAX: (661) 869-8170 EMAIL: <u>Jerry_Frost@oxy.com</u>

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____ DATE PAID: _____ PROJECT NO: <u>S-1123441</u> FACILITY ID: <u>S-1326</u>
------------	--

TV AA



Vintage Production California LLC

A subsidiary of Occidental Petroleum Corporation 

Jerry L. Frost
HES Advisor
9600 Ming Ave, Suite 300
Bakersfield, California
93311

Phone 661.869.8179, Fax 661.869.8170

RECEIVED
SEP 04 2012
SJVAPCD
Southern Region

August 30, 2012

Martin Keast
San Joaquin Valley Air Pollution Control District
Central Regional Office
San Joaquin Valley Unified APCD
1990 E. Gettysburg Ave.
Fresno, CA 93726

Attn: Martin Keast

**Subject: Administrative Amendment
Southern Region Central Heavy Oil Stationary Source Facility ID S-1326**

Dear Martin:

Attached please find an application to modify the following Title V permit with an Administrative Amendment.

S-1326-287-10

If you have any questions please contact me at 661-869-8179.

Sincerely,

Jerry L. Frost
HES Advisor

Attachments

San Joaquin Valley Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

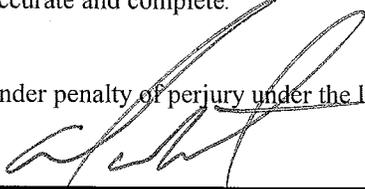
- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: Vintage Production California, LLC	FACILITY ID: S-1326
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: VPC	
3. Agent to the Owner: n/a	

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

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

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



Signature of Responsible Official

8/31/12

Date

Alan E. White

Name of Responsible Official (please print)

Operations Manager

Title of Responsible Official (please print)



AUTHORITY TO CONSTRUCT

PERMIT NO: S-1326-287-10

ISSUANCE DATE: 08/14/2012

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

LOCATION: HEAVY OIL CENTRAL STATIONARY SOURCE
KERN COUNTY, CA

EQUIPMENT DESCRIPTION:

MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY OPERATION WITH 305 STEAM ENHANCED PRODUCTION WELLS CONNECTED TO WELL HEAD CASING VENT VAPOR RECOVERY SYSTEM (CVR) VENTING VAPORS TO SECTION 23 TANK VAPOR RECOVERY SYSTEM (S-1326-263): REMOVE RULE 4401 INSPECTION CONDITIONS, ADD 780 WELLS AND EXPAND TEOR OPERATION TO INCLUDE THE FOLLOWING LOCATIONS: SECTION 24, 25 AND 26, TOWNSHIP: 28S, RANGE: 27E

CONDITIONS

1. 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. 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 TEOR operation shall be located within Sections: 23, 24, 25 and 26, Township: 28S, Range: 27E [District Rule 2201] Federally Enforceable Through Title V Permit
4. Well casing vents shall remain closed, connected to well produced fluids lines, or connected to a well vent VOC collection and control system at all times except during periods of actual service or repair when wells are not producing. [District NSR Rule and District Rule 4401] Federally Enforceable Through Title V Permit
5. Collected CVR vapor shall be piped to tank vapor recovery system (TVR) serving S-1326-263. [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

DAVID WARNER, Director of Permit Services
S-1326-207-10 : Aug 14 2012 9:18AM - DAVIDSOS : Joint Inspection NOT Required

6. VOC content of gas collected by the CVR system shall not exceed 10% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of five years. Permittee may use test results obtained from S-1326-263 to demonstrate compliance. [District NSR Rule and District Rule 4401] Federally Enforceable Through Title V Permit
7. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201 and 4401] Federally Enforceable Through Title V Permit
8. Fluids produced from these steam enhanced wells shall be introduced only to tanks listed on permit S-1326-263 that are vented to an approved vapor collection and control system achieving 99% control. [District NSR Rule] Federally Enforceable Through Title V Permit
9. An operator shall not operate a steam-enhanced crude oil production well unless the operator complies with the following requirements: The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401, the well vent may be temporarily opened during periods of attended service or repair of the well provided such activity is done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere, 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 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
10. Steam enhanced production wells covered by this permit shall each have a visible identification number. Field personnel shall be provided with written instructions concerning proper operation and maintenance of these wells. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The crude oil production from wells associated with this permit unit shall not lie within 1000 feet of an air injection well used for in-situ combustion. [District Rule 4407] Federally Enforceable Through Title V Permit
12. Total combined fugitive emissions from all components associated with this TEOR operation shall not exceed 0.0 lb VOC/ day. [District NSR Rule] Federally Enforceable Through Title V Permit
13. 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 emission control requirements of District Rule 4401, 5.0 (as amended June 16, 2011). [District Rule 4401] Federally Enforceable Through Title V Permit
14. The operator shall maintain monitoring records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401] Federally Enforceable Through Title V Permit
15. Gas and liquid leaks are as defined in Section 3.20 of Rule 4401. [District Rule] Federally Enforceable Through Title V Permit
16. A gas leak is defined as the detection of a concentration of total organic compounds, above background (measured in accordance with EPA Method 21) that exceeds the following values: 1) A major gas leak is a detection of greater than 10,000 ppmv as methane; and 2) A minor gas leak is a detection of 400 to 10,000 ppmv as methane for pressure relief devices (PRDs) and 2,000 to 10,000 for components other than PRDs. [District Rule 4401] Federally Enforceable Through Title V Permit
17. A liquid leak is defined as the dripping of VOC-containing liquid. A major liquid leak is a visible mist or a continuous flow of liquid that is not seal lubricant. A minor liquid leak is a liquid leak that is not a major liquid leak and drips liquid at a rate of more than three drops per minute, except for seal lubricant. [District Rule 4401] Federally Enforceable Through Title V Permit
18. Operator shall affix a readily visible tag bearing the date on which a leak is detected. The tag shall remain in place until the leaking component is repaired. [District Rule 4401] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. An operator shall not use any component with a leak as defined in Section 3.0 of Rule 4401, or that is found to be in violation of the provisions of Section 5.2.2 of Rule 4401. However, components that were found leaking may be used provided such leaking components 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 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
20. An operator shall comply with the requirements of Section 6.7 of Rule 4401 if there is any change in the description of major components or critical components. [District Rule 4401] Federally Enforceable Through Title V Permit
21. An operator shall be in violation of this rule if any District inspection demonstrates that the following conditions in Section 5.2.2 exist at the facility: Existence of an 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 as defined by Section 5.2.2.1 of Rule 4401 requiring process fluid flow through the open-ended lines. [District Rule 4401] Federally Enforceable Through Title V Permit
22. An operator shall be in violation of this rule if any District inspection demonstrates that one or more of the following conditions exist at the facility: existence of a component with any of the following: a major liquid leak, a gas leak greater than 50,000 ppmv, a minor liquid leak or a minor gas leak in excess of the allowable number of leaks allowed by Table 3 of Rule 4401, or a gas leak greater than 10,000 ppmv up to 50,000 ppmv in excess of the allowable number of leaks allowed by Table 3 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
23. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401] Federally Enforceable Through Title V Permit
24. Permittee shall affix a readily visible weatherproof tag to a leaking component upon detection of the leak. The following information shall be included on the tag: 1) the date and time of leak detection; 2) the date and time of leak measurement; 3) leak concentration in ppmv for a gaseous leak; 4) description of whether it is a major liquid leak or a minor liquid leak; and 5) whether the component is an essential component, an unsafe-to-monitor component, or a critical component. [District Rule 4401] Federally Enforceable Through Title V Permit
25. Permittee shall keep the tag affixed to the component until all of the following conditions have been met: 1) the leaking component has been repaired or replaced, and 2) the component has been re-inspected using the test methods described in this permit; and 3) the component is found to be in compliance with the requirements of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
26. Permittee 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] Federally Enforceable Through Title V Permit
27. Except for leaking critical components or leaking essential components, if the operator has minimized a leak but the leak still exceeds the applicable leak limits, the operator shall comply with at least one of the following requirements as soon as practicable but not later than the time period specified in Table 4 of Rule 4401: 1) repair or replace the leaking component; 2) vent the leaking component to a VOC collection and control system; or 3) remove the leaking component from operation. [District Rule 4401] Federally Enforceable Through Title V Permit
28. The leak rate, measured after leak minimization has been performed, shall be used to determine the applicable repair period specified in Table 4 of Rule 4401 and the time of initial leak detection shall be the start of the repair period specified in Table 4 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
29. 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] Federally Enforceable Through Title V Permit
30. Flanges shall be monitored with a portable hydrocarbon detection instrument along the entire circumference of the flange-gasket interface. Threaded connections, tubing fittings, and other types of non-permanent joints shall be monitored along the entire circumference of joint interface. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

31. Valves shall be monitored with a portable hydrocarbon detection instrument where the stem comes through the packing gland, and at any attached or connected body flange(s), bonnet flange(s), or plug(s). [District NSR Rule] Federally Enforceable Through Title V Permit
32. All other components such as diaphragms, dump arms, instruments, meters shall be monitored at all points of possible emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
33. In lieu of conducting annual source tests of 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, all uncondensed VOC emissions collected by a vapor collection and control system shall be incinerated in fuel burning equipment, an internal combustion engine or in a smokeless flare. [District Rule 4401] Federally Enforceable Through Title V Permit
34. An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.0 of Rule 4401: 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] Federally Enforceable Through Title V Permit
35. The control efficiency of the vapor collection and control system used to control VOC emissions from steam enhanced crude oil production well shall be determined by mass balance based on most stringent of a source test, USEPA approved emission factors, or Air Pollution (AP)-42 emission factors for components and number of components; and the efficiency of destruction devices determined by USEPA Method 25, 25a, or 25b as applicable. [District Rule 4401] Federally Enforceable Through Title V Permit
36. 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. Halogenated exempt compounds shall be determined by CARB Method 432. [District Rule 4401] Federally Enforceable Through Title V Permit
37. 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] Federally Enforceable Through Title V Permit
38. 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] Federally Enforceable Through Title V Permit
39. 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] Federally Enforceable Through Title V Permit
40. Permittee shall maintain a copy of the latest APCO-approved Operator Management Plan (OMP) at the facility and make it available to the APCO, ARB, and US EPA upon request. [District Rule 4401] Federally Enforceable Through Title V Permit
41. By January 30 of each year, permittee shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4401] Federally Enforceable Through Title V Permit
42. Permittee shall maintain a current list of all steam enhanced wells authorized by this permit and shall update the list whenever a well is added, replaced, or deleted. [District NSR Rule] Federally Enforceable Through Title V Permit
43. Permittee shall maintain an accurate component count for the well vent collection and control system serving this operation, in accordance with CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors. Permittee shall update such records when new components are installed. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

44. All records required by this permit shall be maintained and retained on-site for a minimum of five (5) years and made available for District, ARB, and EPA inspection upon request. [District Rule 4401] Federally Enforceable Through Title V Permit



Vintage Production California LLC

A subsidiary of Occidental Petroleum Corporation 

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

RECEIVED

MAY 13 2013

SJVAPCD
Southern Region

May 13, 2013

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

Subject: Title V Modification S-1326

Dear Mr. Scandura:

Please find enclosed a Title V Significant Modification application and a check in the amount of \$19 for a Title V modification for ATC S-1326-287-12, located in the Vintage Production California, LLC (VPC) Heavy Oil Central source (S-1326).

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

Attachments

Sincerely,



Jerry Frost
HES Advisor

San Joaquin Valley Air Pollution Control District

www.valleyair.org

RECEIVED

MAY 13 2013

SJVAPCD
Southern Region

Permit Application For:

ADMINISTRATIVE
AMENDMENT

MINOR
MODIFICATION

SIGNIFICANT
MODIFICATION

1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">Vintage Production California LLC</p>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>9600 Ming Ave</u> CITY: <u>Bakersfield</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93311</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>Various specified sections</u> CITY: _____ _____ ¼ SECTION _____ TOWNSHIP <u>28S</u> RANGE <u>27E</u>	INSTALLATION DATE: TBD
4. GENERAL NATURE OF BUSINESS: <u>Crude Oil Production</u>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Title V Modification to submit ATC S-1326-287-12 to EPA review in accordance with APCD Rule 2520.	
6. TYPE OR PRINT NAME OF APPLICANT: <u>JERRY FROST</u>	TITLE OF APPLICANT: <u>HES ADVISOR</u>
7. SIGNATURE OF APPLICANT: 	DATE: <u>5-13-13</u> PHONE: (661) 869-8000 FAX: (661) 869-8059 EMAIL: <u>Jerry_Frost@oxy.com</u>

For APCD Use Only:

EnviroTech

DATE STAMP	FILING FEE RECEIVED: <u>\$ 19-</u> CHECK#: <u>4012</u>
	DATE PAID: <u>pm 5/13/13</u>
	PROJECT NO: <u>S-1131954</u> FACILITY ID: <u>S-1326</u>

RECEIVED
MAY 13 2013

SJVAPCD
Southern Region

San Joaquin Valley Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

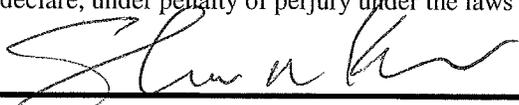
- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: VINTAGE PRODUCTION CA	FACILITY ID: S - 1326
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name:	
3. Agent to the Owner: Jerry Frost	

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

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

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



 Signature of Responsible Official

5/13/13

 Date

Shawn M. Kerns

Name of Responsible Official (please print)

President and General Manager

Title of Responsible Official (please print)

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

TVFORM-009
Rev: July 2005



Vintage Production California LLC

A subsidiary of Occidental Petroleum Corporation 

RECEIVED

MAR 19 2014

SJVAPCD
Southern Region

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

March 19, 2014

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

Subject: Title V Modification S-1326

Dear Mr. Scandura:

Please find enclosed a Title V Minor Modification application and a check in the amount of \$19 to incorporate ATC S-1326-287-13 into the current Title V operating permit for the Vintage Production California, LLC (VPC) Heavy Oil Central Stationary Source (S-1326).

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

Sincerely,



Jerry Frost
HES Advisor

Attachments

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

ADMINISTRATIVE
AMENDMENT

MINOR
MODIFICATION

SIGNIFICANT
MODIFICATION

RECEIVED
MAR 19 2014
SJVAPCD
Southern Region

1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">Vintage Production California LLC</p>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>9600 Ming Ave</u> CITY: <u>Bakersfield</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93311</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>SEE ATC FOR SPECIFIC LOCATIONS</u> CITY: _____ _____ ¼ SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: <p style="text-align: center;">3/17/2014</p>
4. GENERAL NATURE OF BUSINESS: <u>Crude Oil Production</u>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Title V Minor Modification to incorporate ATC S-1326-287-13 as a PTO into the current Title V operating permit for S-1326.	
6. TYPE OR PRINT NAME OF APPLICANT: <p style="text-align: center;">Jerry Frost</p>	TITLE OF APPLICANT: <p style="text-align: center;">HES Advisor</p>
7. SIGNATURE OF APPLICANT: 	DATE: <u>3-19-14</u> PHONE: (661) 869-8000 FAX: (661) 869-8059 EMAIL: <u>Jerry_Frost@oxy.com</u>

For APCD Use Only:

EnviroTech Consultants, Inc.

DATE STAMP <p style="text-align: center;">RECEIVED MAR 19 2014 SJVAPCD Southern Region</p>	FILING FEE RECEIVED: \$ <u>19-</u> CHECK#: <u>4245</u> DATE PAID: <u>3/19/14</u> PROJECT NO: <u>S-1141290</u> FACILITY ID: <u>S-1326</u>
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MAR 19 2014

SJVA PCD
Southern Region

San Joaquin Valley Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

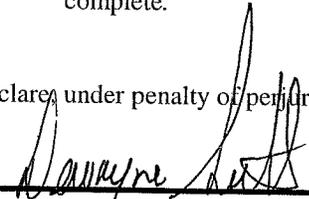
- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: VINTAGE PRODUCTION CALIFORNIA, LLC	FACILITY ID: S - 1326
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: VINTAGE PRODUCTION CALIFORNIA, LLC	
3. Agent to the Owner: VINTAGE PRODUCTION CALIFORNIA, LLC	

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

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

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



 Signature of Responsible Official

3-19-14

 Date

Dewayne Smith

 Name of Responsible Official (please print)

Surface Operations Manager

Title of Responsible Official (please print)

ATTACHMENT E

Previous Title V Operating Permit
S-1547-287-7

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1326-287-7

EXPIRATION DATE: 03/31/2016

SECTION: SW23 **TOWNSHIP:** 28S **RANGE:** 27E

EQUIPMENT DESCRIPTION:

THERMALLY ENHANCED OIL RECOVERY OPERATION WITH 305 STEAM ENHANCED PRODUCTION WELLS CONNECTED TO WELL HEAD CASING VENT VAPOR RECOVERY SYSTEM (CVR) VENTING VAPORS TO SECTION 23 TANK VAPOR RECOVERY SYSTEM (S-1326-263)

PERMIT UNIT REQUIREMENTS

1. Well casing vents shall remain closed, connected to well produced fluids lines, or connected to a well vent VOC collection and control system at all times except during periods of actual service or repair when wells are not producing. [District NSR Rule and District Rule 4401] Federally Enforceable Through Title V Permit
2. Collected CVR vapor shall be piped to tank vapor recovery system (TVR) serving S-1326-263. [District NSR Rule] Federally Enforceable Through Title V Permit
3. VOC content of gas collected by the CVR system shall not exceed 10% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of five years. Permittee may use test results obtained from S-1326-263 to demonstrate compliance. [District NSR Rule and District Rule 1070] Federally Enforceable Through Title V Permit
4. Fluids produced from these steam enhanced wells shall be introduced only to tanks listed on permit S-1326-263 that are vented to an approved vapor collection and control system achieving 99% control. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Permittee shall maintain a current list of all steam enhanced wells authorized by this permit and shall update the list whenever a well is added, replaced, or deleted. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Steam enhanced production wells covered by this permit shall each have a visible identification number. Field personnel shall be provided with written instructions concerning proper operation and maintenance of these wells. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The crude oil production from wells associated with this permit unit shall not lie within 1000 feet of an air injection well used for in-situ combustion. [District Rule 4407, 2.0, 3.4, and 3.5] Federally Enforceable Through Title V Permit
8. Total combined fugitive emissions from all components associated with this TEOR operation shall not exceed 0.0 lb VOC/ day. [District NSR Rule] Federally Enforceable Through Title V Permit
9. 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 emission control requirements of District Rule 4401, 5.0 (as amended December 14, 2006). [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
10. All required source testing shall conform to the compliance testing procedures described in District Rule 1081(as amended December 16, 1993). [District Rule 1081 and County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera)] Federally Enforceable Through Title V Permit
11. The operator shall maintain monitoring records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit

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12. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit
13. Permittee shall perform leak inspections at least annually, using a portable hydrocarbon detection instrument in accordance with USEPA Method 21. 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 centimeter or less from the surface of the component interface. [District Rules 2520, 9.4.2 and 4401]
14. The source shall perform leak inspections at least annually, using a portable hydrocarbon detection instrument in accordance with USEPA Method 21. [District Rules 2520, 9.4.2 and 4401, 6.3.3] Federally Enforceable Through Title V Permit
15. A gas leak is defined as the detection of a concentration of total organic compounds, above background (measured in accordance with EPA Method 21) that exceeds the following values: 1) A major gas leak is a detection of greater than 10,000 ppmv as methane; and 2) A minor gas leak is a detection of 400 to 10,000 ppmv as methane for pressure relief devices (PRDs) and 2,000 to 10,000 for components other than PRDs. [District Rule 4401]
16. A liquid leak is defined as the dripping of VOC-containing liquid. A major liquid leak is a visible mist or a continuous flow of liquid that is not seal lubricant. A minor liquid leak is a liquid leak that is not a major liquid leak and drips liquid at a rate of more than three drops per minute, except for seal lubricant. [District Rule 4401]
17. Portable hydrocarbon detection instrument shall be operated and calibrated in accordance with recommendations in CAPCOA/CARB's California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities (February, 1999). [District NSR Rule] Federally Enforceable Through Title V Permit
18. All polish rod stuffing boxes shall be inspected and screened for leaks using EPA method 21 at least quarterly. If less than two percent of the polish rod stuffing boxes are found to leak during each of five consecutive quarterly inspections, the inspection frequency may be changed from quarterly to annually. If any annual inspection shows that more than 2 percent of the polish rod stuffing boxes are leaking, then quarterly inspections shall be resumed. Any polish rod leaking greater than 10,000 ppmv, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA method 21 or leaking at a rate of greater than 3 drops of liquid per minute shall be repaired consistent with the procedures specified in Section 5.3.1 of Rule 4401. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Operator shall affix a readily visible tag bearing the date on which a leak is detected. The tag shall remain in place until the leaking component is repaired. [District Rule 4401, 5.3.1] Federally Enforceable Through Title V Permit
20. The permittee shall not use any components that leak in excess of the applicable leak standards as specified in this permit. Components that have been found leaking in excess of the applicable leak standards of this rule may be used provided such leaking components have been identified with a tag for repair, are repaired, or are awaiting re-inspection after being repaired, within the applicable time period specified in this permit. [District Rule 4401]
21. Permittee shall maintain a copy of the latest APCO-approved Operator Management Plan (OMP) at the facility and make it available to the APCO, ARB, and US EPA upon request. [District Rule 4401]
22. By January 30 of each year, permittee shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4401]
23. During District compliance inspection, the following conditions shall be used to determination of a violation: 1) Existence of an 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; 2) Existence of a component with a major liquid leak; 3) Existence of a component with a gas leak greater than 50,000 ppmv; or 4) Existence of a component leak consisting of a minor liquid or gas leak, or a gas leak greater than 10,000 ppmv up to 50,000 ppmv, in excess of the allowable number of leaks specified in Table 3 of Rule 4401. [District Rule 4401]

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24. Permittee shall keep all hatches closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401]
25. Except for pipes and unsafe-to-monitor components, permittee 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 Rule 4401 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 4 of Rule 4401. [District Rule 4401]
26. Permittee shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401]
27. Permittee shall inspect audio-visually (by hearing and by sight) for leaks all accessible operating pumps, compressors, and pressure relief devices (PRDs) in service at least once each calendar week. [District Rule 4401]
28. 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 Rule 4401 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 4 of Rule 4401. [District Rule 4401]
29. Permittee 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. Permittee 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. [District Rule 4401]
30. Permittee shall inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. [District Rule 4401]
31. Except for PRDs, permittee 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]
32. Permittee shall affix a readily visible weatherproof tag to a leaking component upon detection of the leak. The following information shall be included on the tag: 1) the date and time of leak detection; 2) the date and time of leak measurement; 3) leak concentration in ppmv for a gaseous leak; 4) description of whether it is a major liquid leak or a minor liquid leak; and 5) whether the component is an essential component, an unsafe-to-monitor component, or a critical component. [District Rule 4401]
33. Permittee shall keep the tag affixed to the component until all of the following conditions have been met: 1) the leaking component has been repaired or replaced, and 2) the component has been re-inspected using the test methods described in this permit; and 3) the component is found to be in compliance with the requirements of Rule 4401. [District Rule 4401]
34. Permittee 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]
35. Except for leaking critical components or leaking essential components, if the operator has minimized a leak but the leak still exceeds the applicable leak limits, the operator shall comply with at least one of the following requirements as soon as practicable but not later than the time period specified in Table 4 of Rule 4401: 1) repair or replace the leaking component; 2) vent the leaking component to a VOC collection and control system; or 3) remove the leaking component from operation. [District Rule 4401]
36. The leak rate, measured after leak minimization has been performed, shall be used to determine the applicable repair period specified in Table 4 of Rule 4401 and the time of initial leak detection shall be the start of the repair period specified in Table 4 of Rule 4401. [District Rule 4401]
37. 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]

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38. Permittee shall maintain an inspection log in which, at a minimum, all of the following information shall be recorded 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 liquid leaks record whether the leak is a major liquid leak or a minor liquid leak; 5) The date of repair, replacement, or removal from operation of leaking components; 6) The identify and location of essential components and critical components 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 one year after leak detection, whichever comes earlier; 8) The date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced; 9) The inspector's 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]
39. Well casings, casing vents, any casing vent piping and fluid piping associated with these wells shall be screened and inspected for leaks at least quarterly with a minimum of 25% of the wells tested per quarter. Any leak greater than 5000 ppm, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21 or leaking at a rate of greater than 3 drops of liquid per minute, shall be repaired in a manner consistent with the procedures specified in Section 5.3.1 of Rule 4401. [District NSR Rule] Federally Enforceable Through Title V Permit
40. Components to be screened shall be identified and categorized according to the following equipment types: connectors, flanges, open-ended lines, pump seals, valves with visible actuators, polished rods stuffing boxes and other (pressure relief devices, compressor seals, meters, etc.). [District NSR Rule] Federally Enforceable Through Title V Permit
41. Flanges shall be monitored with a portable hydrocarbon detection instrument along the entire circumference of the flange-gasket interface. Threaded connections, tubing fittings, and other types of non-permanent joints shall be monitored along the entire circumference of joint interface. [District NSR Rule] Federally Enforceable Through Title V Permit
42. Valves shall be monitored with a portable hydrocarbon detection instrument where the stem comes through the packing gland, and at any attached or connected body flange(s), bonnet flange(s), or plug(s). [District NSR Rule] Federally Enforceable Through Title V Permit
43. All other components such as diaphragms, dump arms, instruments, meters shall be monitored at all points of possible emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
44. 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. This requirement does not apply to cyclic wells located on contiguous and adjacent oil production properties with less than 10 cyclic wells owned by or under the control of a company. [District Rule 4401, 5.1 and 5.2] Federally Enforceable Through Title V Permit
45. Operator shall maintain all components of a well vent vapor collection and control system in good repair. Components of the well vent vapor collection and control system shall include all piping, valves, fittings, pumps, compressors, tanks, etc. used to collect, control, store, or dispose of VOC condensate or non-condensable VOCs and which is prior to any blending of VOC condensate with crude oil or blending of non-condensable VOCs with gases to be used as a fuel. [District Rule 4401, 5.3 and 5.3.2] Federally Enforceable Through Title V Permit
46. Total number of leaks from the vapor collection and control system, including condensate handling, shall not exceed the number as allowed by Rule 4401 (as amended December 14, 2006) at any one time. [District Rule 4401, 5.3] Federally Enforceable Through Title V Permit
47. Permittee shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures, as necessary. Permittee shall maintain at the facility the copies of the training records of the training program. [District Rule 4401]

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48. Annual control efficiency compliance tests shall be performed on all vapor collection and control systems used to control emissions from steam-enhanced crude oil production wells. Testing shall be performed by source testers certified by the California Air Resources Board (CARB) during June, July, August or September of each year if the system's control efficiency is dependent upon ambient air temperature. The APCO may waive the annual testing requirements of this condition if the vapor control system does not exhaust to atmosphere or 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 open flare, and the source's Operating Permit contains adequate periodic monitoring to ensure the source meets 99% control efficiency. [District Rule 4401, 5.1, 5.2 and 6.2.1] Federally Enforceable Through Title V Permit
49. The control efficiency of the vapor collection and control system used to control VOC emissions from steam enhanced crude oil production well shall be determined by mass balance based on most stringent of a source test, USEPA approved emission factors, or Air Pollution (AP)-42 emission factors for components and number of components; and the efficiency of destruction devices determined by USEPA Method 25, 25a, or 25b as applicable. [District Rule 4401, 6.3.1] Federally Enforceable Through Title V Permit
50. VOC content shall be determined using ASTM Method E168, E169, or E260 as applicable, or equivalent test method with prior District approval. Halogenated exempt compounds shall be determined by CARB Method 432. [District Rule 4401, 6.3.2] Federally Enforceable Through Title V Permit
51. 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
52. 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
53. 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
54. Permittee shall maintain an accurate component count for the well vent collection and control system serving this operation, in accordance with CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors. Permittee shall update such records when new components are installed. [District NSR Rule] Federally Enforceable Through Title V Permit
55. Permittee shall keep the steam-enhanced crude oil production well vents closed and the front line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) shall be connected to a VOC collection and control system. The well vent may be temporarily opened during periods of attended service or repair of the well provided such activity is done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401]
56. For a period of at least five years, permittee shall maintain records of the component inspections required by this permit, including the components inspected, date of inspection, leak screening level concentration values recorded and manner and date of repair and reinspection of identified leaking components. Records shall be made readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
57. Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components. The records shall include a copy of the current calibration gas certification from the vendor of the calibration gas cylinder, the date of calibration, the concentration of calibration gas, the instrument reading of calibration gas before adjustment, the instrument reading of calibration gas after adjustment, the calibration gas expiration date, and the calibration gas cylinder pressure at the time of calibration. [District Rule 4401]
58. All records required by this permit shall be maintained and retained on-site for a minimum of five (5) years and made available for District, ARB, and EPA inspection upon request. [District Rule 4401]

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