



AUG 03 2015

Mr. Joseph Butler
Macpherson Oil Company
PO Box 6368
Bakersfield, CA 93388

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)
District Facility # S-1703
Project # 1153381**

Dear Mr. Butler:

Enclosed for your review is the District's analysis of an application for Authorities to Construct for the facility identified above. You requested that Certificates of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. Macpherson Oil Company (MOC) has requested Authority to Construct (ATC) permits authorizing connection of three currently permit-exempt WEMCO units to the vapor control system listed on permit S-1703-144.

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

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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4800 Enterprise Way
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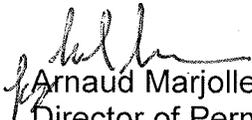
Southern Region
34946 Flyover Court
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AUG 03 2015

Mr. Joseph Butler
Page 2

Thank you for your cooperation in this matter.

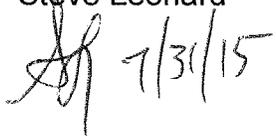
Sincerely,


Arnaud Marjollet
Director of Permit Services

Enclosures

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

San Joaquin Valley Air Pollution Control District
Authority to Construct Application Review
Connect WEMCOs to Vapor Control

Facility Name:	Macpherson Oil Company	Date:	7/30/15
Mailing Address:	PO Box 6368 Bakersfield, CA 93388	Engineer:	David Torii
Contact Person:	Joseph Butler	Lead Engineer:	Steve Leonard
Telephone:	661-368-3909		
Application #(s):	S-1703-144-21, '218-0, '219-0 and '220-0		
Project #:	1153381		
Deemed Complete:	7/30/15		

I. Proposal

Macpherson Oil Company (MOC) has requested Authority to Construct (ATC) permits authorizing connection of three currently permit-exempt WEMCO units to the vapor control system listed on permit S-1703-144.

Disposition of Outstanding ATCs:

ATC S-1703-144-18 serves as the base document.

MOC received their Title V Permit on 5/31/01. This modification can be classified as a Title V minor modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. MOC must apply to administratively amend their Title V permit.

II. Applicable Rules

Rule 2201 New and Modified Stationary Source Review Rule (4/21/11)
Rule 2410 Prevention of Significant Deterioration (6/16/11) *This rule applies to attainment pollutants only. The subject equipment only emits VOC. VOC is not an attainment pollutant; therefore, this rule does not apply.*
Rule 2520 Federally Mandated Operating Permits (6/21/01)
Rule 4001 New Source Performance Standards (4/14/99)
Rule 4101 Visible Emissions (2/17/05)
Rule 4102 Nuisance (12/17/92)
Rule 4623 Storage of Organic Liquids (05/19/05)
CH&SC 41700 Health Risk Assessment
CH&SC 42301.6 School Notice
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. Project Location

The proposed project is located within SE/4 of Section 18, T28S, R29E in MOC's Central Heavy Oil Stationary Source within the Round Mountain Oil Field. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

Produced water from a skim tank is sent to the subject WEMCOs to separate residual oil and solids. The WEMCOs are multi-stage mechanical gas induction equipment that are capable of removing in excess of 90% of the suspended oil and solids.

The WEMCOs remove the oil and suspended solids by mechanically inducing gas bubbles in each of four flotation cells. As the water flows through the four cells in series, the gas bubbles rise and attach themselves to oil droplets and suspended solids. As the oil and solids are captured, a froth is formed on the fluid surface in each cell. Mechanical paddles push the froth into the launder boxes located on each side of the WEMCOs. The froth containing the oil and solids gravity flows to a slop tank.

The processed water from the WEMCOs gravity flows to a charge tank. From there the water may be pumped to the water plant for further processing and/or gravity flow a waste water tank for disposal.

A process flow diagram is provided in Appendix A.

V. Equipment Listing

Pre-Project Equipment Description (see ATC in Appendix B):

ATC S-1703-144-18: MODIFICATION OF 2,000 BBL FIXED ROOF PETROLEUM STORAGE TANK #T-240 SERVED BY VAPOR CONTROL SYSTEM SHARED WITH S-1703-145, '-146, '-150, '-152, '-195, '-209, AND '-214 VENTING TO VAPOR CONTROL SYSTEM PERMITTED UNDER S-1703-143 AND/OR DIRECTLY TO STEAM GENERATORS S-1703-157, '-158, '-159, '-160, '-161, AND '-162 FOR INCINERATION: CONNECT TANK '-215 TO VAPOR CONTROL SYSTEM

Proposed Modification:

S-1703-144-21: MODIFICATION OF 2,000 BBL FIXED ROOF CRUDE OIL STORAGE TANK #T-240 SERVED BY VAPOR CONTROL SYSTEM SHARED WITH S-1703-145, '-146, '-150, '-152, '-195, '-209, '-214 AND '-215 VENTING TO VAPOR CONTROL SYSTEM PERMITTED UNDER S-1703-143 AND/OR DIRECTLY TO STEAM GENERATORS S-1703-157, '-158, '-159, '-160, '-161, AND '-162 FOR INCINERATION: CONNECT WEMCO UNITS S-1703-218, '219 AND '220 TO VAPOR CONTROL SYSTEM

S-1703-218-0: 356 BBL WEMCO SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-1703-144

S-1703-219-0: 268 BBL WEMCO SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-1703-144

S-1703-220-0: 268 BBL WEMCO SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-1703-144

Post Project Equipment Description:

S-1703-144-21: 2,000 BBL FIXED ROOF CRUDE OIL STORAGE TANK #T-240 SERVED BY VAPOR CONTROL SYSTEM SHARED WITH S-1703-145, '-146, '-150, '-152, '-195, '-209, '-214, '-215, '-218, '-219 and '-220 VENTING TO VAPOR CONTROL SYSTEM PERMITTED UNDER S-1703-143 AND/OR DIRECTLY TO STEAM GENERATORS S-1703-157, '-158, '-159, '-160, '-161, AND '-162 FOR INCINERATION

S-1703-218-0: 356 BBL WEMCO SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-1703-144

S-1703-219-0: 268 BBL WEMCO SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-1703-144

S-1703-220-0: 268 BBL WEMCO SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-1703-144

VI. Emission Control Technology Evaluation

The WEMCOs will be served by the tank vapor control system listed on S-1703-144 which collects vapors and routes the uncondensed vapors to incineration devices or disposal well(s). The efficiency of the vapor control system is at least 95%.

VII. General Calculations

A. Assumptions

- Facility operates 24 hr/day, 365 days/yr.
- The WEMCOs are considered to be new.
- All new components in this project handle only vapors with less than 10% by weight VOCs (gas analysis in Attachment III) which, according to District Policy SSP-2015, are negligible and not included in emissions calculations.
- According to determination #11 of District FYI -111, connection of the WEMCOs to the '-144 vapor control system is not a NSR modification (of '-144). Therefore the change to '-144 is not subject to Rule 2201 (NSR analysis) and calculations are not required.

B. Calculations

1. Pre-Project Potential to Emit (PE1)

Since the WEMCOs are new emissions units, PE1 = 0 for all pollutants.

2. Post Project Potential to Emit (PE2)

Permit Unit	VOC - Daily PE2 (lb/day)	VOC - Annual PE2 (lb/Year)
S-1703-218-0	0	0
S-1703-219-0	0	0
S-1703-220-0	0	0

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

Pursuant to District Rule 2201, the SSPE1 is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of Emission Reduction Credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions (AER) that have occurred at the source, and which have not been used on-site.

Facility emissions are already above the Offset and Major Source Thresholds for VOC emissions; therefore, SSPE1 calculations are not necessary.

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

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

Since facility emissions are already above the Offset and Major Source Thresholds for VOC emissions, SSPE2 calculations are not necessary.

5. Major Source Determination

Rule 2201 Major Source Determination:

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following shall not be included:

- any ERCs associated with the stationary source
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165

As stated above, all emissions associated with this project are fugitive emissions. Therefore, emissions associated with the ATCs in this project are not included in determining if the facility is a Major Source for Rule 2201.

6. Baseline Emissions (BE)

The BE calculation (in lb/year) is performed pollutant-by-pollutant to determine the amount of offsets required.

Pursuant to District Rule 2201, $BE = PE1$ for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

$BE =$ Historic Actual Emissions (HAE), calculated pursuant to District Rule 2201.

Since the WEMCOs are new emissions units, $BE = PE1 = 0$ for all pollutants.

7. SB 288 Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

Since this source is not included in the 28 specific source categories specified in 40 CFR 51.165, the increases in fugitive emissions are not included in the SB 288 Major Modification calculation.

8. Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

Since this source is not included in the 28 specific source categories specified in 40 CFR 51.165, the increases in fugitive emissions are not included in the Federal Major Modification determination.

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless specifically exempted by Rule 2201, BACT shall be required for the following actions*:

- a. Any new emissions unit with a potential to emit exceeding two pounds per day,

- b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
- c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
- d. Any new or modified emissions unit, in a stationary source project, which results in an SB 288 Major Modification or a Federal Major Modification, as defined by the rule.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

a. New emissions units – PE > 2 lb/day

The applicant is proposing to install new WEMCOs with a PE of 0 lb/day for VOC. Since the daily VOC emissions are less than 2.0 lbs/day, BACT will not be triggered.

b. Relocation of emissions units – PE > 2 lb/day

As discussed in Section I above, there are no emissions units being relocated from one stationary source to another; therefore BACT is not triggered.

c. Modification of emissions units – AIPE > 2 lb/day

As discussed in Section I above, there are no modified emissions units associated with this project. Therefore BACT is not triggered.

d. SB 288/Federal Major Modification

As discussed in Sections VII.C.7 and VII.C.8 above, this project does not constitute an SB 288 or Federal Major Modification. Therefore BACT is not triggered.

B. Offsets

1. Offset Applicability

Offsets will not be required for this project since the increase in permitted emissions is zero.

C. Public Notification

Public notice will not be triggered for this project since the increase in permitted emissions is zero.

D. Daily Emission Limits (DELs)

DELs and other enforceable conditions are required by Rule 2201 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. The DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

Proposed Rule 2201 (DEL) Conditions:

- Maximum VOC content of vapor in the tank vapor control system shall not exceed 10% by weight. [District Rule 2201]

E. Compliance Assurance

1. Source Testing

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

2. Monitoring

The following monitoring conditions are required to demonstrate compliance with Rule 2201.

Operator shall conduct quarterly gas sampling after TVR compressor (prior to connection to any other vapor control system) and at either the first line tank or at any secondary tank which is heated above ambient temperature. If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] N

All vessel and vapor control system piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated to methane, to ensure compliance with the provisions of this permit. If any of the vessel components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no vessel components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 ft above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201]

3. Recordkeeping

Recordkeeping is required to demonstrate compliance with the offset, public notification and daily emission limit requirements of Rule 2201. The following condition(s) are listed on the permit to operate:

Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. [District Rule 2201] Y

Permittee shall maintain records of the VOC content of vapor in the tank vapor control system, including date and test results. [District Rule 2201] Y

All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rules 2201 and 4623] Y

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

Rule 2520 Federally Mandated Operating Permits

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

In accordance with Rule 2520, these modifications:

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

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

Rule 4001 New Source Performance Standards (NSPS)

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

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

40 CFR Part 60, Subpart OOOO—Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution (constructed, reconstructed, or modified after 8/23/11) applies to single storage vessel, located in the oil and natural gas production segment, natural gas processing segment or natural gas transmission and storage segment. The subject tanks are subject to this subpart. However, Subpart OOOO has no standards for

tanks with annual VOC emissions less than 6 tons per year. Therefore, the subject tanks are not an affected facility and subpart OOOO does not apply.

Rule 4101 Visible Emissions

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

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

Rule 4102 Nuisance

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

California Health & Safety Code 41700 (Health Risk Assessment)

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

An HRA is not required for a project with a total facility prioritization score of less than one. According to the Technical Services Memo for this project (**Appendix C**), the total facility prioritization score including this project was greater than one. Therefore, an HRA was required to determine the short-term acute and long-term chronic exposure from this project.

The cancer risk for this project is shown below:

RMR Summary				
Categories	Tank Vapor Control (Unit 144-21)		Project Totals	Facility Totals
Prioritization Score	NA ¹		NA ¹	>1.0
Acute Hazard Index	0.0		0.0	0.05
Chronic Hazard Index	0.0		0.0	0.02
Maximum Individual Cancer Risk (10⁻⁶)	0.003		0.003	8.65
T-BACT Required?	No			
Special Permit Conditions?	No			

¹Prioritization for this unit was not conducted since it has been determined that the facility prioritization score was greater than 1.0.

Discussion of T-BACT

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

Rule 4623, Storage of Organic Liquids

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

According to Section 4.4, tanks exclusively receiving and or storing organic liquids with a TVP less than 0.5 psia are exempt from this Rule except for complying with Sections 6.2, 6.3.6, 6.4 and 7.2. Therefore, the following conditions shall be placed on the ATC:

{2480} This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rules 2201 and 4623] N

{Modified 2910} Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank upon initial start-up, at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 2201 and 4623] N

The permittee shall conduct API gravity testing upon initial start-up. [District Rules 4623] N

{Modified 2911} The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. [District Rule 4623]

{Modified 2483} For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "Test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rules 2201 and 4623] N

{Modified 2482} The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rules 2201 and 4623] N

{Modified 2912} Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rules 2201 and 4623] N

Section 5.7 - Voluntary Tank Preventive Inspection and Maintenance, and Tank Interior Cleaning Program

The following conditions will be added to WEMCO ATCs:

Permittee shall notify the APCO in writing at least three (3) days prior to performing vessel degassing and interior vessel cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the vessel being degassed, 2) the date and time that vessel degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the vessel, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge,

including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rule 2080] Y

This vessel shall be degassed before commencing interior cleaning by following one of the following options: 1) exhausting VOCs contained in the vessel vapor space to an APCO-approved vapor recovery system until the organic vapor concentration is 5,000 ppmv or less, or is 10 percent or less of the lower explosion limit (LEL), whichever is less, or 2) by displacing VOCs contained in the vessel vapor space to an APCO-approved vapor recovery system by filling the vessel with a suitable liquid until 90 percent or more of the maximum operating level of the vessel is filled. Suitable liquids are organic liquids having a TVP of less than 0.5 psia, water, clean produced water, or produced water derived from crude oil having a TVP less than 0.5 psia, or 3) by displacing VOCs contained in the vessel vapor space to an APCO-approved vapor recovery system by filling the vessel with a suitable gas. Degassing shall continue until the operator has achieved a vapor displacement equivalent to at least 2.3 times the vessel capacity. Suitable gases are air, nitrogen, carbon dioxide, or natural gas containing less than 10 percent VOC by weight. [District Rule 2080] Y

During vessel degassing, the operator shall discharge or displace organic vapors contained in the vessel vapor space to an APCO-approved vapor recovery system. [District Rule 2080] Y

To facilitate connection to an external APCO-approved recovery system, a suitable vessel fitting, such as a manway, may be temporarily removed for a period of time not to exceed 1 hour. [District Rule 2080] Y

While performing vessel cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 degrees F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 2080] Y

Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 2080] Y

Compliance with the requirements of this rule is expected.

California Health & Safety Code 42301.6 (School Notice)

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

California Environmental Quality Act (CEQA)

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

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

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

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

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

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Pending a successful NSR Public Noticing period, issue ATCs S-1703-144-21, '218-0, '219-0 and '220-0 subject to the permit conditions on the attached draft ATCs in **Appendix D**.

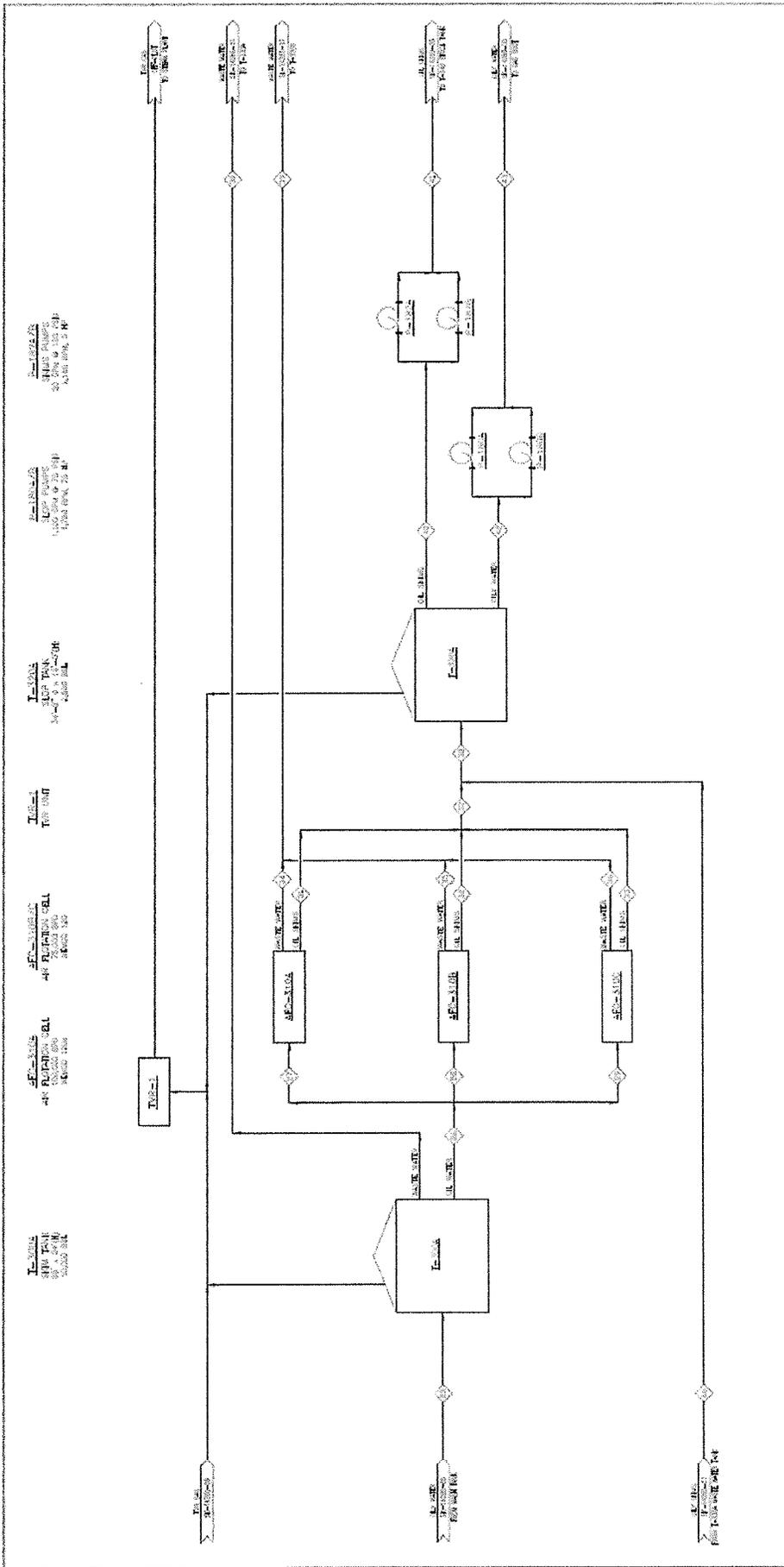
X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
S-1703-144-21	3020-05 D	84,000 gallons	\$194
S-1703-218-0	3020-05 B	14,960 gallons	\$98
S-1703-219-0	3020-05 B	11,250 gallons	\$98
S-1703-220-0	3020-05 B	11,250 gallons	\$98

Appendixes

- A: Process Flow Diagram
- B: Base Document ATC
- C: HRA Summary
- D: Draft ATC

Appendix A
Process Flow Diagram



SPECIFICATIONS		MATERIALS		DESIGN		CONSTRUCTION		OPERATION	
NO.	DESCRIPTION	GRADE	TYPE	SIZE	THICKNESS	WEIGHT	STRENGTH	TEMPERATURE	PRESSURE
1	STEEL PIPE	A106	SEAMLESS	12"	0.375"	100	100,000	300	150
2	STEEL PIPE	A106	SEAMLESS	8"	0.312"	60	100,000	300	150
3	STEEL PIPE	A106	SEAMLESS	6"	0.281"	40	100,000	300	150
4	STEEL PIPE	A106	SEAMLESS	4"	0.234"	25	100,000	300	150
5	STEEL PIPE	A106	SEAMLESS	3"	0.187"	15	100,000	300	150
6	STEEL PIPE	A106	SEAMLESS	2"	0.149"	10	100,000	300	150
7	STEEL PIPE	A106	SEAMLESS	1.5"	0.125"	7	100,000	300	150
8	STEEL PIPE	A106	SEAMLESS	1"	0.104"	5	100,000	300	150
9	STEEL PIPE	A106	SEAMLESS	0.75"	0.083"	4	100,000	300	150
10	STEEL PIPE	A106	SEAMLESS	0.5"	0.062"	3	100,000	300	150
11	STEEL PIPE	A106	SEAMLESS	0.375"	0.047"	2	100,000	300	150
12	STEEL PIPE	A106	SEAMLESS	0.25"	0.031"	1	100,000	300	150
13	STEEL PIPE	A106	SEAMLESS	0.187"	0.023"	1	100,000	300	150
14	STEEL PIPE	A106	SEAMLESS	0.149"	0.018"	1	100,000	300	150
15	STEEL PIPE	A106	SEAMLESS	0.125"	0.016"	1	100,000	300	150
16	STEEL PIPE	A106	SEAMLESS	0.104"	0.013"	1	100,000	300	150
17	STEEL PIPE	A106	SEAMLESS	0.083"	0.010"	1	100,000	300	150
18	STEEL PIPE	A106	SEAMLESS	0.062"	0.008"	1	100,000	300	150
19	STEEL PIPE	A106	SEAMLESS	0.047"	0.006"	1	100,000	300	150
20	STEEL PIPE	A106	SEAMLESS	0.031"	0.004"	1	100,000	300	150
21	STEEL PIPE	A106	SEAMLESS	0.023"	0.003"	1	100,000	300	150
22	STEEL PIPE	A106	SEAMLESS	0.018"	0.002"	1	100,000	300	150
23	STEEL PIPE	A106	SEAMLESS	0.016"	0.002"	1	100,000	300	150
24	STEEL PIPE	A106	SEAMLESS	0.013"	0.001"	1	100,000	300	150
25	STEEL PIPE	A106	SEAMLESS	0.010"	0.001"	1	100,000	300	150
26	STEEL PIPE	A106	SEAMLESS	0.008"	0.001"	1	100,000	300	150
27	STEEL PIPE	A106	SEAMLESS	0.006"	0.001"	1	100,000	300	150
28	STEEL PIPE	A106	SEAMLESS	0.004"	0.001"	1	100,000	300	150
29	STEEL PIPE	A106	SEAMLESS	0.003"	0.001"	1	100,000	300	150
30	STEEL PIPE	A106	SEAMLESS	0.002"	0.001"	1	100,000	300	150
31	STEEL PIPE	A106	SEAMLESS	0.001"	0.001"	1	100,000	300	150

MACPHERSON Oil Company
 ROUND MOUNTAIN OIL FIELD - HAR. ARE. UNIT
 PROCESS FLOW DIAGRAM (MOP)
 SECTION 18 - CAPACITY STUDY
 T-202S/A-29E SECTION 18

DESIGNED BY T. S. BROWN
 CHECKED BY J. W. BROWN
 DATE 10/15/54
 SHEET NO. 18 OF 20
 DWG. NO. SK-14285-10

TUGBOSS
 TUGBOSS ENGINEERING CORP.
 1100 N. 10TH ST.
 DENVER, CO. 80202
 TEL. 333-1111
 FAX 333-1111

NO.	DESCRIPTION	GRADE	TYPE	SIZE	THICKNESS	WEIGHT	STRENGTH	TEMPERATURE	PRESSURE
1	STEEL PIPE	A106	SEAMLESS	12"	0.375"	100	100,000	300	150
2	STEEL PIPE	A106	SEAMLESS	8"	0.312"	60	100,000	300	150
3	STEEL PIPE	A106	SEAMLESS	6"	0.281"	40	100,000	300	150
4	STEEL PIPE	A106	SEAMLESS	4"	0.234"	25	100,000	300	150
5	STEEL PIPE	A106	SEAMLESS	3"	0.213"	15	100,000	300	150
6	STEEL PIPE	A106	SEAMLESS	2"	0.187"	10	100,000	300	150
7	STEEL PIPE	A106	SEAMLESS	1.5"	0.156"	7	100,000	300	150
8	STEEL PIPE	A106	SEAMLESS	1"	0.131"	5	100,000	300	150
9	STEEL PIPE	A106	SEAMLESS	0.75"	0.109"	4	100,000	300	150
10	STEEL PIPE	A106	SEAMLESS	0.5"	0.087"	3	100,000	300	150
11	STEEL PIPE	A106	SEAMLESS	0.375"	0.070"	2	100,000	300	150
12	STEEL PIPE	A106	SEAMLESS	0.25"	0.056"	1	100,000	300	150
13	STEEL PIPE	A106	SEAMLESS	0.187"	0.045"	1	100,000	300	150
14	STEEL PIPE	A106	SEAMLESS	0.149"	0.036"	1	100,000	300	150
15	STEEL PIPE	A106	SEAMLESS	0.125"	0.030"	1	100,000	300	150
16	STEEL PIPE	A106	SEAMLESS	0.104"	0.024"	1	100,000	300	150
17	STEEL PIPE	A106	SEAMLESS	0.083"	0.019"	1	100,000	300	150
18	STEEL PIPE	A106	SEAMLESS	0.062"	0.015"	1	100,000	300	150
19	STEEL PIPE	A106	SEAMLESS	0.047"	0.012"	1	100,000	300	150
20	STEEL PIPE	A106	SEAMLESS	0.031"	0.009"	1	100,000	300	150
21	STEEL PIPE	A106	SEAMLESS	0.023"	0.007"	1	100,000	300	150
22	STEEL PIPE	A106	SEAMLESS	0.018"	0.005"	1	100,000	300	150
23	STEEL PIPE	A106	SEAMLESS	0.016"	0.004"	1	100,000	300	150
24	STEEL PIPE	A106	SEAMLESS	0.013"	0.003"	1	100,000	300	150
25	STEEL PIPE	A106	SEAMLESS	0.010"	0.002"	1	100,000	300	150
26	STEEL PIPE	A106	SEAMLESS	0.008"	0.002"	1	100,000	300	150
27	STEEL PIPE	A106	SEAMLESS	0.006"	0.001"	1	100,000	300	150
28	STEEL PIPE	A106	SEAMLESS	0.004"	0.001"	1	100,000	300	150
29	STEEL PIPE	A106	SEAMLESS	0.003"	0.001"	1	100,000	300	150
30	STEEL PIPE	A106	SEAMLESS	0.002"	0.001"	1	100,000	300	150
31	STEEL PIPE	A106	SEAMLESS	0.001"	0.001"	1	100,000	300	150

Appendix B
Base Document ATC

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1703-144-18

ISSUANCE DATE: 08/08/2013

LEGAL OWNER OR OPERATOR: MACPHERSON OIL COMPANY

MAILING ADDRESS: PO BOX 5368
BAKERSFIELD, CA 93388

LOCATION: HEAVY OIL CENTRAL STATIONARY SOURCE
CA

SECTION: 18 TOWNSHIP: 28S RANGE: 29E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 2,000 BBL FIXED ROOF PETROLEUM STORAGE TANK #T-240 SERVED BY VAPOR CONTROL SYSTEM SHARED WITH S-1703-145, '-146, '-150, '-152, '-195, '-209, AND '-214 VENTING TO VAPOR CONTROL SYSTEM PERMITTED UNDER S-1703-143 AND/OR DIRECTLY TO STEAM GENERATORS S-1703-157, '-158, '-159, '-160, '-161, AND '-162 FOR INCINERATION: CONNECT TANK '-215 TO VAPOR CONTROL SYSTEM

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. Authority to Construct (ATC) S-1703-144-17 shall be implemented prior to or concurrently with this ATC. [District Rule 2201]
3. PTO S-1703-145-10 shall be cancelled upon implementation of ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times with the exception of power curtailment events. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
6. Maximum VOC content of vapor in the tank vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

S-1703-144-18 : Jul 30 2015 2:43PM -- TORID : Joint Inspection NOT Required



7. The tank vapors may be introduced into TEOR system S-1703-143 at either the main trunk line, or immediately upstream of the H2S scrubber system. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained to prevent leaks. The vapors shall be incinerated to reduce the inlet VOC emissions by at least 99% by weight as determined by the test method specified in Section 6.4 of Rule 4623 in any of the following steam generators: S-1703-157, -158, -159, -160, -161, or -162; or vapors shall be injected into DOGGR approved wells listed on permit S-1703-143. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) Eliminate or minimize the leak within 8 hours after detection. (b) If the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices; and eliminate the leak within 48 hours after detection. (c) In no event shall the total time to minimize and eliminate the leak exceed 56 hours after detection. [District Rule 2201] Federally Enforceable Through Title V Permit
10. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 2201] Federally Enforceable Through Title V Permit
11. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
12. All vessel and vapor control system piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated to methane, to ensure compliance with the provisions of this permit. If any of the vessel components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no vessel components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 ft above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Permittee shall notify the APCO in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rule 2080] Federally Enforceable Through Title V Permit
14. This tank shall be degassed before commencing interior cleaning by following one of the following options: 1) exhausting VOCs contained in the tank vapor space to an APCO-approved vapor recovery system until the organic vapor concentration is 5,000 ppmv or less, or is 10 percent or less of the lower explosion limit (LEL), whichever is less, or 2) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable liquid until 90 percent or more of the maximum operating level of the tank is filled. Suitable liquids are organic liquids having a TVP of less than 0.5 psia, water, clean produced water, or produced water derived from crude oil having a TVP less than 0.5 psia, or 3) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable gas. Degassing shall continue until the operator has achieved a vapor displacement equivalent to at least 2.3 times the tank capacity. Suitable gases are air, nitrogen, carbon dioxide, or natural gas containing less than 10 percent VOC by weight. [District Rule 2080] Federally Enforceable Through Title V Permit
15. During tank degassing, the operator shall discharge or displace organic vapors contained in the tank vapor space to an APCO-approved vapor recovery system. [District Rule 2080] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

16. To facilitate connection to an external APCO-approved recovery system, a suitable tank fitting, such as a manway, may be temporarily removed for a period of time not to exceed 1 hour. [District Rule 2080] Federally Enforceable Through Title V Permit
17. While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 degrees F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 2080] Federally Enforceable Through Title V Permit
18. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 2080] Federally Enforceable Through Title V Permit
19. Before disposal of VOC vapors by well injection, the applicant shall obtain written notification from DOGGR that the wells are approvable for injection. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 4623] Federally Enforceable Through Title V Permit
21. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
22. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
23. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
24. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit
25. Operator shall conduct quarterly gas sampling after TVR compressor (prior to connection to any other vapor control system) and at either the first line tank or at any secondary tank which is heated above ambient temperature. If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
26. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
27. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
28. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
29. Permittee shall maintain records of the VOC content of vapor in the tank vapor control system, including date and test results. [District Rule 2201] Federally Enforceable Through Title V Permit
30. The permittee shall maintain a written log of the date and duration of each power curtailment event. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

31. The permittee shall keep written documentation from the power supplier indicating the date, and duration of the curtailment in addition to the beginning and end times. [District Rule 2201] Federally Enforceable Through Title V Permit
32. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

Appendix C
HRA Summary

San Joaquin Valley Air Pollution Control District Risk Management Review

To: David Torii – Permit Services
 From: Leland Villalvazo – Technical Services
 Date: August 2, 2015
 Facility Name: Macpherson Oil Company
 Location: HOC
 Application #(s): S-1703-144-21, '218-0, '219-0 and '220-0
 Project #: S-1153381

A. RMR SUMMARY

RMR Summary				
Categories	Tank Vapor Control (Unit 144-21)		Project Totals	Facility Totals
Prioritization Score	NA ¹		NA ¹	>1.0
Acute Hazard Index	0.0		0.0	0.05
Chronic Hazard Index	0.0		0.0	0.02
Maximum Individual Cancer Risk (10⁻⁶)	0.003		0.003	8.65
T-BACT Required?	No			
Special Permit Conditions?	No			

¹Prioritization for this unit was not conducted since it has been determined that the facility prioritization score was greater than 1.0.

Proposed Permit Conditions

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

Unit # 144-21, 218-0, '219-0 and '220-0
 No special conditions are required.

B. RMR REPORT

I. Project Description

Technical Services received a request on July 29, 2015, to perform a Risk Management Review for a proposed modification to a whey processing operation. The modification consisted of the installation of: a 15.4 MMBtu/hr natural gas-fired dryer (8-0); a 22.4 MMBtu/hr natural gas-fired dryer (9-0); three storage silos (10-1, 11-1 and 12-0); and a bagging operation (13-0, 14-0 and 15-0). The PM emissions associated with the storage silos and the bagging operation did not contain any HAP's and therefore were not included in this analysis (10-0 through 15-0).

II. Analysis

Technical Services performed a health risk assessment using the Toxic Fugitive Emissions from Oilfield Equipment. The cumulative prioritization scores were greater than 1.0, thus modeling was conducted using the AERMOD model, with the parameters outlined below and meteorological data for 2009-2013 from Bakersfield to determine the dispersion factors (i.e., the predicted concentration or X divided by the normalized source strength or Q) for a receptor grid.

Analysis Parameters			
Unit 144-21			
Source Type	Area Circle	Location Type	Urban
Radius (m)	4.572	Closest Receptor (m)	1900
Vertices (m)	20	Type of Receptor	Residential
Release Height (m)	9.16	Pollutant Type	VOC
		Emission Rate	0.04 lb/hr

III. Conclusion

The acute and chronic indices are below 1.0 and the cancer risk factor associated with the project is less than 1.0 in a million. **In accordance with the District's Risk Management Policy, the project is approved without Toxic Best Available Control Technology (T-BACT).**

To ensure that human health risks will not exceed District allowable levels; the permit conditions listed on page 1 of this report must be included for this proposed unit.

These conclusions are based on the data provided by the applicant and the project engineer. Therefore, this analysis is valid only as long as the proposed data and parameters do not change.

Appendix D
Draft ATC

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1703-144-21

LEGAL OWNER OR OPERATOR: MACPHERSON OIL COMPANY
MAILING ADDRESS: PO BOX 5368
BAKERSFIELD, CA 93388

LOCATION: HEAVY OIL CENTRAL STATIONARY SOURCE
CA

SECTION: 18 **TOWNSHIP:** 28S **RANGE:** 29E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 2,000 BBL FIXED ROOF CRUDE OIL STORAGE TANK #T-240 SERVED BY VAPOR CONTROL SYSTEM SHARED WITH S-1703-145, '-146, '-150, '-152, '-195, '-209, '-214 AND '-215 VENTING TO VAPOR CONTROL SYSTEM PERMITTED UNDER S-1703-143 AND/OR DIRECTLY TO STEAM GENERATORS S-1703-157, '-158, '-159, '-160, '-161, AND '-162 FOR INCINERATION: CONNECT WEMCO UNITS S-1703-218, '219 AND '220 TO VAPOR CONTROL SYSTEM

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times with the exception of power curtailment events. [District Rule 2201] Federally Enforceable Through Title V Permit
4. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
5. Maximum VOC content of vapor in the tank vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director, APCO

Arnaud Marjollet, Director of Permit Services

S-1703-144-21 : Jul 31 2015 1:47PM -- TORID : Joint Inspection NOT Required

6. The tank vapors may be introduced into TEOR system S-1703-143 at either the main trunk line, or immediately upstream of the H₂S scrubber system. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The tank shall be equipped with a vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor control system shall be APCO-approved and maintained to prevent leaks. The vapors shall be incinerated to reduce the inlet VOC emissions by at least 99% by weight as determined by the test method specified in Section 6.4 of Rule 4623 in any of the following steam generators: S-1703-157, -158, -159, -160, -161, or -162; or vapors shall be injected into DOGGR approved wells listed on permit S-1703-143. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) Eliminate or minimize the leak within 8 hours after detection. (b) If the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices; and eliminate the leak within 48 hours after detection. (c) In no event shall the total time to minimize and eliminate the leak exceed 56 hours after detection. [District Rule 2201] Federally Enforceable Through Title V Permit
9. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 2201] Federally Enforceable Through Title V Permit
10. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
11. All vessel and vapor control system piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated to methane, to ensure compliance with the provisions of this permit. If any of the vessel components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no vessel components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 ft above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Permittee shall notify the APCO in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rule 2080] Federally Enforceable Through Title V Permit
13. This tank shall be degassed before commencing interior cleaning by following one of the following options: 1) exhausting VOCs contained in the tank vapor space to an APCO-approved vapor recovery system until the organic vapor concentration is 5,000 ppmv or less, or is 10 percent or less of the lower explosion limit (LEL), whichever is less, or 2) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable liquid until 90 percent or more of the maximum operating level of the tank is filled. Suitable liquids are organic liquids having a TVP of less than 0.5 psia, water, clean produced water, or produced water derived from crude oil having a TVP less than 0.5 psia, or 3) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable gas. Degassing shall continue until the operator has achieved a vapor displacement equivalent to at least 2.3 times the tank capacity. Suitable gases are air, nitrogen, carbon dioxide, or natural gas containing less than 10 percent VOC by weight. [District Rule 2080] Federally Enforceable Through Title V Permit
14. During tank degassing, the operator shall discharge or displace organic vapors contained in the tank vapor space to an APCO-approved vapor recovery system. [District Rule 2080] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

15. To facilitate connection to an external APCO-approved recovery system, a suitable tank fitting, such as a manway, may be temporarily removed for a period of time not to exceed 1 hour. [District Rule 2080] Federally Enforceable Through Title V Permit
16. While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 degrees F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 2080] Federally Enforceable Through Title V Permit
17. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 2080] Federally Enforceable Through Title V Permit
18. Before disposal of VOC vapors by well injection, the applicant shall obtain written notification from DOGGR that the wells are approvable for injection. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 4623] Federally Enforceable Through Title V Permit
20. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
21. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
22. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
23. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit
24. Operator shall conduct quarterly gas sampling after TVR compressor (prior to connection to any other vapor control system) and at either the first line tank or at any secondary tank which is heated above ambient temperature. If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
25. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
26. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
28. Permittee shall maintain records of the VOC content of vapor in the tank vapor control system, including date and test results. [District Rule 2201] Federally Enforceable Through Title V Permit
29. The permittee shall maintain a written log of the date and duration of each power curtailment event. [District Rule 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

30. The permittee shall keep written documentation from the power supplier indicating the date, and duration of the curtailment in addition to the beginning and end times. [District Rule 2201] Federally Enforceable Through Title V Permit
31. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-1703-218-0

LEGAL OWNER OR OPERATOR: MACPHERSON OIL COMPANY
MAILING ADDRESS: PO BOX 5368
BAKERSFIELD, CA 93388

LOCATION: HEAVY OIL CENTRAL STATIONARY SOURCE
CA

SECTION: SE18 TOWNSHIP: 28S RANGE: 29E

EQUIPMENT DESCRIPTION:
356 BBL WEMCO SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-1703-144

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
4. Maximum VOC content of vapor in the tank vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) Eliminate or minimize the leak within 8 hours after detection. (b) If the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices; and eliminate the leak within 48 hours after detection. (c) In no event shall the total time to minimize and eliminate the leak exceed 56 hours after detection. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director, APCO

Arnaud Marjolle, Director of Permit Services

S-1703-218-0 : Jul 30 2015 2:42PM - TORID Joint Inspection NOT Required

6. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 2201] Federally Enforceable Through Title V Permit
7. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. All vessel and vapor control system piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated to methane, to ensure compliance with the provisions of this permit. If any of the vessel components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no vessel components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 ft above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Permittee shall notify the APCO in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rule 2080] Federally Enforceable Through Title V Permit
10. This tank shall be degassed before commencing interior cleaning by following one of the following options: 1) exhausting VOCs contained in the tank vapor space to an APCO-approved vapor recovery system until the organic vapor concentration is 5,000 ppmv or less, or is 10 percent or less of the lower explosion limit (LEL), whichever is less, or 2) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable liquid until 90 percent or more of the maximum operating level of the tank is filled. Suitable liquids are organic liquids having a TVP of less than 0.5 psia, water, clean produced water, or produced water derived from crude oil having a TVP less than 0.5 psia, or 3) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable gas. Degassing shall continue until the operator has achieved a vapor displacement equivalent to at least 2.3 times the tank capacity. Suitable gases are air, nitrogen, carbon dioxide, or natural gas containing less than 10 percent VOC by weight. [District Rule 2080] Federally Enforceable Through Title V Permit
11. During tank degassing, the operator shall discharge or displace organic vapors contained in the tank vapor space to an APCO-approved vapor recovery system. [District Rule 2080] Federally Enforceable Through Title V Permit
12. To facilitate connection to an external APCO-approved recovery system, a suitable tank fitting, such as a manway, may be temporarily removed for a period of time not to exceed 1 hour. [District Rule 2080] Federally Enforceable Through Title V Permit
13. While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 degrees F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 2080] Federally Enforceable Through Title V Permit
14. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 2080] Federally Enforceable Through Title V Permit
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CONDITIONS CONTINUE ON NEXT PAGE

17. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
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25. Permittee shall maintain records of the VOC content of vapor in the tank vapor control system, including date and test results. [District Rule 2201] Federally Enforceable Through Title V Permit
26. The permittee shall maintain a written log of the date and duration of each power curtailment event. [District Rule 2201] Federally Enforceable Through Title V Permit
27. The permittee shall keep written documentation from the power supplier indicating the date, and duration of the curtailment in addition to the beginning and end times. [District Rule 2201] Federally Enforceable Through Title V Permit
28. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-1703-219-0

LEGAL OWNER OR OPERATOR: MACPHERSON OIL COMPANY

MAILING ADDRESS: PO BOX 5368
BAKERSFIELD, CA 93388

LOCATION: HEAVY OIL CENTRAL STATIONARY SOURCE
CA

SECTION: SE18 TOWNSHIP: 28S RANGE: 29E

EQUIPMENT DESCRIPTION:

268 BBL WEMCO SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-1703-144

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
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5. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) Eliminate or minimize the leak within 8 hours after detection. (b) If the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices; and eliminate the leak within 48 hours after detection. (c) In no event shall the total time to minimize and eliminate the leak exceed 56 hours after detection. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director, APCO

Arnaud Marjollet, Director of Permit Services

S-1703-219-0 Jul 30 2015 2:42PM - TORID : Joint Inspection NOT Required

6. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 2201] Federally Enforceable Through Title V Permit
7. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. All vessel and vapor control system piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated to methane, to ensure compliance with the provisions of this permit. If any of the vessel components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no vessel components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 ft above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201] Federally Enforceable Through Title V Permit
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10. This tank shall be degassed before commencing interior cleaning by following one of the following options: 1) exhausting VOCs contained in the tank vapor space to an APCO-approved vapor recovery system until the organic vapor concentration is 5,000 ppmv or less, or is 10 percent or less of the lower explosion limit (LEL), whichever is less, or 2) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable liquid until 90 percent or more of the maximum operating level of the tank is filled. Suitable liquids are organic liquids having a TVP of less than 0.5 psia, water, clean produced water, or produced water derived from crude oil having a TVP less than 0.5 psia, or 3) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable gas. Degassing shall continue until the operator has achieved a vapor displacement equivalent to at least 2.3 times the tank capacity. Suitable gases are air, nitrogen, carbon dioxide, or natural gas containing less than 10 percent VOC by weight. [District Rule 2080] Federally Enforceable Through Title V Permit
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CONDITIONS CONTINUE ON NEXT PAGE

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1703-220-0

LEGAL OWNER OR OPERATOR: MACPHERSON OIL COMPANY
MAILING ADDRESS: PO BOX 5368
BAKERSFIELD, CA 93388

LOCATION: HEAVY OIL CENTRAL STATIONARY SOURCE
CA

SECTION: SE18 **TOWNSHIP:** 28S **RANGE:** 29E

EQUIPMENT DESCRIPTION:
268 BBL WEMCO SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-1703-144

CONDITIONS

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Seyed Sadredin, Executive Director, APCO

Arnaud Marjollet, Director of Permit Services

S-1703-220-0 : Jul 30 2015 2:42PM - TORID : Joint Inspection NOT Required

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8. All vessel and vapor control system piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated to methane, to ensure compliance with the provisions of this permit. If any of the vessel components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no vessel components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 ft above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Permittee shall notify the APCO in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rule 2080] Federally Enforceable Through Title V Permit
10. This tank shall be degassed before commencing interior cleaning by following one of the following options: 1) exhausting VOCs contained in the tank vapor space to an APCO-approved vapor recovery system until the organic vapor concentration is 5,000 ppmv or less, or is 10 percent or less of the lower explosion limit (LEL), whichever is less, or 2) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable liquid until 90 percent or more of the maximum operating level of the tank is filled. Suitable liquids are organic liquids having a TVP of less than 0.5 psia, water, clean produced water, or produced water derived from crude oil having a TVP less than 0.5 psia, or 3) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable gas. Degassing shall continue until the operator has achieved a vapor displacement equivalent to at least 2.3 times the tank capacity. Suitable gases are air, nitrogen, carbon dioxide, or natural gas containing less than 10 percent VOC by weight. [District Rule 2080] Federally Enforceable Through Title V Permit
11. During tank degassing, the operator shall discharge or displace organic vapors contained in the tank vapor space to an APCO-approved vapor recovery system. [District Rule 2080] Federally Enforceable Through Title V Permit
12. To facilitate connection to an external APCO-approved recovery system, a suitable tank fitting, such as a manway, may be temporarily removed for a period of time not to exceed 1 hour. [District Rule 2080] Federally Enforceable Through Title V Permit
13. While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 degrees F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 2080] Federally Enforceable Through Title V Permit
14. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 2080] Federally Enforceable Through Title V Permit
15. Before disposal of VOC vapors by well injection, the applicant shall obtain written notification from DOGGR that the wells are approvable for injection. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 4623] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

17. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
18. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
19. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
20. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit
21. Operator shall conduct quarterly gas sampling after TVR compressor (prior to connection to any other vapor control system) and at either the first line tank or at any secondary tank which is heated above ambient temperature. If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
22. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
23. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Permittee shall maintain records of the VOC content of vapor in the tank vapor control system, including date and test results. [District Rule 2201] Federally Enforceable Through Title V Permit
26. The permittee shall maintain a written log of the date and duration of each power curtailment event. [District Rule 2201] Federally Enforceable Through Title V Permit
27. The permittee shall keep written documentation from the power supplier indicating the date, and duration of the curtailment in addition to the beginning and end times. [District Rule 2201] Federally Enforceable Through Title V Permit
28. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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