



NOV 17 2015

Mr. Shamim Reza  
Linn Operating, Inc  
5201 Truxtun Ave, Suite 100  
Bakersfield, CA 93309

**Re: Notice of Minor Title V Permit Modification  
District Facility # S-1246  
Project # 1154059**

Dear Mr. Reza:

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 Authority to Construct (ATC) S-1246-290-19 (under project S-1152063) into the Title V operating permit. The ATC authorized steam generator S-1246-406 as an additional combustion device.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct (ATC) S-1246-290-19, 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. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,

  
Arnaud Marjollet  
Director of Permit Services

Enclosures

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

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

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**Northern Region**  
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  
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**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-1154059

Engineer: Richard Edgehill  
Date: November 5, 2015

Facility Number: S-1246  
Facility Name: Linn Operating, Inc  
Mailing Address: 5201 Truxtun Ave, Suite 100  
Bakersfield, CA 93309

*RWK*

*11-10-15*

Contact Name: Shamim Reza  
Phone: (661) 616-3889  
Responsible Official: Robert Boston

Title: Manager of EHS

## I. PROPOSAL

Linn Operating Inc (Linn) is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct (ATC) S-1246-290-19 into the Title V permit. The ATC authorized steam generator S-1246-406 as an additional combustion device.

## II. FACILITY LOCATION

The equipment is located at SE Section 36, T12N, R24W in the heavy oil western stationary source.

## III. EQUIPMENT DESCRIPTION

PTO S-1246-290-22: TEOR SYSTEM WITH WELL VENT CASING GAS COLLECTION AND CONTROL SYSTEM INCLUDING UP TO 400 STEAM ENHANCED WELLS, GAS/LIQUID SEPARATORS, TRANSFER PUMPS, AIR-COOLED HEAT EXCHANGERS, CONDENSATE TANKS (< 100 BBL), CVR GAS SCRUBBER, VAPOR COMPRESSOR(S), SULFUR SCRUBBER(S), VAPOR PIPING TO FUEL GAS SYSTEM, AND BOOSTER COMPRESSOR WITH DOGGR APPROVED WASTE GAS DISPOSAL WELLS (ETHEL D PROPERTY)

## IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

## V. APPLICABLE REQUIREMENTS

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

## VI. DESCRIPTION OF PROPOSED MODIFICATIONS

A condition match between the draft PTOs and current PTOs is provided below.

S-1246-290

Draft PTO '-290-22	Current PTO '-290-20	Comments
1,2	1,2	Draft PTO lists '-406 on both conditions
3-56	3-56	
	57	Requirement to surrender ERCs deleted from draft PTO
57-61	58-62	

## 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.

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**

- I. Proposed Modified Title V Operating Permit
- II. Authority to Construct
- III. Application
- IV. Previous Title V Operating Permit

Attachment A  
Proposed Title V draft PTO

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1246-290-22

**EXPIRATION DATE:** 03/31/2016

**SECTION:** SE36 **TOWNSHIP:** 12N **RANGE:** 24W

## **EQUIPMENT DESCRIPTION:**

TEOR SYSTEM WITH WELL VENT CASING GAS COLLECTION AND CONTROL SYSTEM INCLUDING UP TO 400 STEAM ENHANCED WELLS, GAS/LIQUID SEPARATORS, TRANSFER PUMPS, AIR-COOLED HEAT EXCHANGERS, CONDENSATE TANKS (< 100 BBL), CVR GAS SCRUBBER, VAPOR COMPRESSOR(S), SULFUR SCRUBBER(S), VAPOR PIPING TO FUEL GAS SYSTEM, AND BOOSTER COMPRESSOR WITH DOGGR APPROVED WASTE GAS DISPOSAL WELLS (ETHEL D PROPERTY)

## **PERMIT UNIT REQUIREMENTS**

1. Well vent vapor collection and control system includes piping from sulfur scrubber(s) to steam generators S-1246-19, '-24, '-269, '-354, '-406 and a permit exempt 4.2 MMBtu/hr heater treater. Well vent vapor collection and control system includes bypass piping around sulfur scrubber(s) to booster compressor for up to 3 DOGGR-approved vapor disposal well(s). Only one sulfur scrubber need operate at any time provided compliance with emissions limits have been demonstrated when operating only one sulfur scrubber. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Scrubbed well vent vapor collection and control system (TEOR) gas shall be incinerated only in steam generators S-1246-19, '-24, '-269, '-354, '-406 and a 4.2 MMBtu/hr heater treater, and unscrubbed gas may be disposed of in up to 3 DOGGR-approved vapor disposal wells. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Sulfur scrubber(s) shall meet at least one of the following performance criteria: sulfur compounds reduction efficiency shall be maintained at 95% or greater, or the sulfur compounds concentration in the vapors exiting the sulfur scrubber(s) shall not exceed 3 ppmv. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Compliance with sulfur scrubber efficiency requirement shall be demonstrated by measurement of total sulfur compound concentrations at scrubber inlet and outlet. The measurement shall be conducted on grab samples taken at scrubber inlet and outlet using one of the following test methods: ASTM D1072, ASTM D3246, ASTM D6228 (GC-FPD), double GC for H<sub>2</sub>S and mercaptans, or equivalent test method with prior District approval. Grab samples shall be taken and analyzed upon initial use of the scrubber and, thereafter, every six months. If scrubber is not in use at six month anniversary date, then efficiency shall be demonstrated within two weeks of returning scrubber to service. For each month in which scrubber is operated and laboratory analysis of grab samples is not required, operator shall monitor and adjust scrubber performance as needed using gas-detection tubes calibrated for existing sulfur species or other equivalent District approved sulfur detection method(s) or device(s). [District Rule 2201] Federally Enforceable Through Title V Permit
5. During recharging of the sulfur scrubber(s), untreated well casing vent collection system vapors shall not be introduced into the fuel system or vented to the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Collected vapors sent to District approved incineration devices shall be processed through sulfur scrubber(s) prior to incineration. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The sulfur scrubber(s) shall be operated to maintain continued compliance with fuel sulfur content limits on steam generator S-1246-24 and '-354. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

8. Permittee shall cease injection vapors and notify the District immediately if DOGGR vapor disposal well approval is revoked, denied, terminated, surrendered or altered to disallow injection. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Scrubbed well casing vent vapor collection and control system gas burned in 4.2 MMBtu/hr heater treater shall be demonstrated by fuel gas analysis to qualify for permit exemption immediately upon burning TEOR gas in unit and at least every six months thereafter. [District Rule 2020, 8.0] Federally Enforceable Through Title V Permit
10. Fugitive VOC emissions rate for the TEOR operation shall be calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c, Oil and Gas Production Screening Value Ranges Emission Factors (Feb 1999) and the total number of components in gas service including polish rods. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Fugitive VOC emissions rate associated with this TEOR operation shall not exceed 121.8 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 December 14, 2006). [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
13. 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, 5.1.1 and 5.1.2] Federally Enforceable Through Title V Permit
14. An operator shall be in violation of this rule if any District inspection demonstrates that one or more of the following conditions in Section 5.2.2 exist at the facility or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates that one or more of 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, 5.2.1] Federally Enforceable Through Title V Permit
15. 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 or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates that one or more of the conditions in Section 5.2.2 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 2 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 2 of Rule 4401. [District Rule 4401, 5.2.2] Federally Enforceable Through Title V Permit
16. An operator shall source test annually all vapor collection and control systems used to control emissions from steam-enhanced crude oil production well vents to determine the control efficiency of the device(s) used for destruction or removal of VOC. Compliance testing shall be performed annually by source testers certified by ARB. Testing shall be performed during June, July, August, or September of each year if the system's control efficiency is dependent upon ambient air temperature. A process system as defined by Rule 4401 is not subject to compliance source test requirements. [District Rule 4401 6.2.1] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

17. 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 6.2.3] Federally Enforceable Through Title V Permit
18. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4401 6.3.1] Federally Enforceable Through Title V Permit
19. VOC content shall be analyzed by using the latest revision of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be performed by using ARB Method 432. [District Rule 4401 6.3.2] Federally Enforceable Through Title V Permit
20. Leak inspection, other than audio-visual, and measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. Where safety is a concern, such as measuring leaks from compressor seals or pump seals when the shaft is rotating, a person shall measure leaks by placing the instrument probe inlet at a distance of one (1) centimeter or less from the surface of the component interface. [District Rule 4401 6.3.3] Federally Enforceable Through Title V Permit
21. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401 6.3.4] Federally Enforceable Through Title V Permit
22. Gas and liquid leaks are as defined in Section 3.20 of Rule 4401. [District Rule 4401, 3.20] Federally Enforceable Through Title V Permit
23. 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 5.3.1] Federally Enforceable Through Title V Permit
24. 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 5.3.2] Federally Enforceable Through Title V Permit
25. 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 5.3.3] Federally Enforceable Through Title V Permit
26. Except for pipes and unsafe-to-monitor components, an operator shall inspect all other components pursuant to the requirements of Section 6.3.3 of Rule 4401 at least once every year. [District Rule 4401 5.4.1] Federally Enforceable Through Title V Permit
27. An operator shall visually inspect all pipes at least once every year. Any visual inspection of pipes that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected within 24 hours after detecting the leak. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 3 of Rule 4401. [District Rule 4401 5.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

28. An operator shall inspect for leaks all accessible operating pumps, compressors, and PRDs in service as follows: 1) An operator shall audio-visually (by hearing and by sight) inspect for leaks all accessible operating pumps, compressors, and PRDs in service at least once each calendar week. 2) Any audio-visual inspection of an accessible operating pump, compressor, and PRD performed by an operator that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected not later than 24 hours after conducting the audio-visual inspection. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 4 of this Rule. [District Rule 4401, 5.4.3] Federally Enforceable Through Title V Permit
29. The operator shall also perform the following inspections: 1) An operator shall initially inspect a PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the discovery of the release. An operator shall re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection. 2) An operator shall inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service, and 3) Except for PRDs subject to the requirements of Section 5.8.4.1 of this Rule, an operator shall inspect a component that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. [District Rule 4401, 5.4.4] Federally Enforceable Through Title V Permit
30. An operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401 5.4.5] Federally Enforceable Through Title V Permit
31. District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. [District Rule 4401 5.4.6] Federally Enforceable Through Title V Permit
32. Upon detection of a leak, an operator shall affix a readily visible weatherproof tag to that leaking component that includes the following information: 1) The date and time of leak detection; 2) The date and time of the leak measurement; 3) For a gaseous leak, the leak concentration in ppmv; 4) For a liquid leak, whether it is a major or minor liquid leak; and 5) Whether the component is an essential component, and unsafe-to-monitor component, or a critical component. [District Rule 4401, 5.5.1] Federally Enforceable Through Title V Permit
33. The tag shall remain affixed to the leaky component until all the following requirements are met: 1) The component is repaired or replaced, 2) The component is re-inspected as set forth in Section 6.3, and 3) The component is found to be in compliance with this Rule. [District Rule 4401, 5.5.2] Federally Enforceable Through Title V Permit
34. An operator shall minimize a component leak in order to stop or reduce leakage to the atmosphere immediately to the extent possible, but not later than one (1) hour after detection of the leak. [District Rule 4401 5.5.3] Federally Enforceable Through Title V Permit
35. Except for leaking critical components or leaking essential components subject to the requirements of Section 5.5.7 of Rule 4401, if an operator has minimized a leak but the leak still exceeds the applicable leak limits as defined in Section 3.0 of Rule 4401, an 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 3 of Rule 4401: Repair or replace the leaking component; or vent the leaking component to a VOC collection and control system as defined in Section 3.0 of Rule 4401, or remove the leaking component from operation. [District Rule 5.5.4] Federally Enforceable Through Title V Permit
36. The repair period in calendar days shall not exceed 14 days for minor gas leaks, 5 days for major gas leaks less than or equal to 50,000 ppmv, 2 days for gas leak greater than 50,000 ppmv, 3 days for minor liquid leaks, 2 days for major liquid leaks. [District Rule 5.5.4] Federally Enforceable Through Title V Permit
37. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period specified in Table 3 of Rule 4401. [District Rule 4401 5.5.5] Federally Enforceable Through Title V Permit
38. The time of the initial leak detection shall be the start of the repair period specified in Table 3 of Rule 4401. [District Rule 4401 5.5.6] 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.

39. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401 5.5.7] Federally Enforceable Through Title V Permit
40. By January 30 of each year, an operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to an existing Operator Management Plan. [District Rule 4401 6.7] Federally Enforceable Through Title V Permit
41. An inspection and maintenance program consistent with Rule 4409 shall be implemented and maintained for polish rod stuffing boxes (identified by annual well roster required by this permit). [District Rule 2201] Federally Enforceable Through Title V Permit
42. Permittee shall provide District with copy of DOGGR approval of vapor disposal well prior to injecting any TEOR gas. [District Rule 2010] Federally Enforceable Through Title V Permit
43. Permittee shall maintain a written record of inlet and outlet sulfur compound measurements and recharging dates and such records shall be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
44. Permittee shall maintain with the permit a current listing of all steam enhanced wells with casing vents connected to the well vent collection and control system. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
45. Permittee shall maintain accurate component count for TEOR operation according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors. Permittee shall update such records when new components are installed. [District Rule 2201] Federally Enforceable Through Title V Permit
46. Operator shall maintain an inspection log in which an operator records, at a minimum, all of the following information for each inspection performed: The total number of components inspected, total number and percentage of leaking components found by component type, location, type, and name or description of each leaking component and description of any unit where the leaking component is found, date of leak detection and the method of leak detection. 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. the date of repair, replacement, or removal from operation of leaking components, 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, 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, the date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced, the inspector's name, business mailing address, and business telephone number, date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401 6.4] Federally Enforceable Through Title V Permit
47. The operator of any steam-enhanced crude oil production well shall maintain records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401 6.1.1] Federally Enforceable Through Title V Permit
48. An operator of any steam-enhanced crude oil production well shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 6.1.3] Federally Enforceable Through Title V Permit
49. Operator of any steam-enhanced crude oil production well shall keep an inspection log maintained pursuant to Section 6.4 of Rule 4401. [District Rule 4401 6.1.4] 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.

50. Records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, instrument reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration shall be maintained. [District Rule 4401 6.1.5] Federally Enforceable Through Title V Permit
51. An operator shall maintain copies at the facility of the training records of the training program operated pursuant to Section 6.5 of Rule 4401. [District Rule 4401 6.1.6] Federally Enforceable Through Title V Permit
52. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401 6.1.7] Federally Enforceable Through Title V Permit
53. Operator shall submit to the APCO not later than June 14, 2007 a list of all gauge tanks, as defined in Section 3.17. The list shall contain the size, identification number, the location of each gauge tank and specify whether the gauge tank is upstream of all front line production equipment. [District Rule 4401 6.1.8] Federally Enforceable Through Title V Permit
54. The results of gauge tank TVP testing conducted pursuant to Section 6.2.3 shall be submitted to the APCO within 60 days after the completion of the testing. [District Rule 4401 6.1.9] Federally Enforceable Through Title V Permit
55. An operator that discovers that a PRD has released shall record the date that the release was discovered, and the identity and location of the PRD that released. An operator shall submit such information recorded during the calendar year to the APCO no later than 60 days after the end of the calendar year. [District Rule 4401 6.1.10] Federally Enforceable Through Title V Permit
56. 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 1070, 4401, and 2520, 9.4.2] Federally Enforceable Through Title V Permit
57. Permittee shall retain records on-site demonstrating compliance with California Department of Fish and Game mitigation measures BIO 1 through 23 to ensure the protection of potential biological species impacts. [Public Resources Code 21000-21177: California Environmental Quality Act]
58. In the event that archaeological/paleontological resources are discovered during ground-disturbing activities associated with construction of the proposed Project, all work within 100 feet of the find shall cease. BPC will notify and retain a qualified archaeologist/paleontologist to assess and provide an evaluation of the significance of the find. BPC shall determine whether avoidance is necessary and feasible in light of the factors such as the nature of the find, project design, costs, and other considerations, and, if necessary, develop appropriate mitigation measures in consultation with Kern County and other appropriate agencies and individuals. Work may resume on the project site once the evaluation of the find is complete by the qualified archaeologist/paleontologist. [Public Resources Code 21000-21177: California Environmental Quality Act]
59. In the event that human remains are discovered during construction of the Project, all work within 100 feet shall be ceased and the discovery will immediately be reported to the County Coroner. If the remains are determined to be Native American in origin, the County Coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours of the determination. The NAHC will solicit those persons it believe to be the nearest descendants of the remains for recommendations. BPC shall, in consultation with the identified descendants of the remains and/or NAHC, will identify the appropriate measures for the treatment or disposition of the remains. [Public Resources Code 21000-21177: California Environmental Quality Act]
60. During construction activities, if unknown, unrecorded or abandoned wells are discovered or if any wells are damaged, BPC shall immediately notify DOGGR. [Public Resources Code 21000-21177: California Environmental Quality Act]
61. Any wells discovered or exposed during construction activities will be tested for flammable vapors. [Public Resources Code 21000-21177: California Environmental Quality Act]

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

Attachment B  
Authority to Construct

# AUTHORITY TO CONSTRUCT

PERMIT NO: S-1246-290-19

ISSUANCE DATE: 05/12/2015

LEGAL OWNER OR OPERATOR: LINN OPERATING, INC  
MAILING ADDRESS: 5201 TRUXTUN AVE, SUITE 100  
BAKERSFIELD, CA 93309

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE  
KERN COUNTY, CA

SECTION: SE36 TOWNSHIP: 12N RANGE: 24W

## EQUIPMENT DESCRIPTION:

MODIFICATION OF TEOR SYSTEM WITH WELL VENT CASING GAS COLLECTION AND CONTROL SYSTEM INCLUDING UP TO 400 STEAM ENHANCED WELLS, GAS/LIQUID SEPARATORS, TRANSFER PUMPS, AIR-COOLED HEAT EXCHANGERS, CONDENSATE TANKS (< 100 BBL), CVR GAS SCRUBBER, VAPOR COMPRESSOR(S), SULFUR SCRUBBER(S), VAPOR PIPING TO FUEL GAS SYSTEM, AND BOOSTER COMPRESSOR WITH DOGGR APPROVED WASTE GAS DISPOSAL WELLS (ETHEL D PROPERTY): ADD STEAM GENERATOR '-406 AS COMBUSTION DEVICE

## CONDITIONS

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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. Well vent vapor collection and control system includes piping from sulfur scrubber(s) to steam generators S-1246-19, '-24, '-269, '-354, '-406 and a permit exempt 4.2 MMBtu/hr heater treater. Well vent vapor collection and control system includes bypass piping around sulfur scrubber(s) to booster compressor for up to 3 DOGGR-approved vapor disposal well(s). Only one sulfur scrubber need operate at any time provided compliance with emissions limits have been demonstrated when operating only one sulfur scrubber. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Scrubbed well vent vapor collection and control system (TEOR) gas shall be incinerated only in steam generators S-1246-19, '-24, '-269, '-354, '-406 and a 4.2 MMBtu/hr heater treater, and unscrubbed gas may be disposed of in up to 3 DOGGR-approved vapor disposal wells. [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

4. Sulfur scrubber(s) shall meet at least one of the following performance criteria: sulfur compounds reduction efficiency shall be maintained at 95% or greater, or the sulfur compounds concentration in the vapors exiting the sulfur scrubber(s) shall not exceed 3 ppmv. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Compliance with sulfur scrubber efficiency requirement shall be demonstrated by measurement of total sulfur compound concentrations at scrubber inlet and outlet. The measurement shall be conducted on grab samples taken at scrubber inlet and outlet using one of the following test methods: ASTM D1072, ASTM D3246, ASTM D6228 (GC-FPD), double GC for H<sub>2</sub>S and mercaptans, or equivalent test method with prior District approval. Grab samples shall be taken and analyzed upon initial use of the scrubber and, thereafter, every six months. If scrubber is not in use at six month anniversary date, then efficiency shall be demonstrated within two weeks of returning scrubber to service. For each month in which scrubber is operated and laboratory analysis of grab samples is not required, operator shall monitor and adjust scrubber performance as needed using gas-detection tubes calibrated for existing sulfur species or other equivalent District approved sulfur detection method(s) or device(s). [District Rule 2201] Federally Enforceable Through Title V Permit
6. During recharging of the sulfur scrubber(s), untreated well casing vent collection system vapors shall not be introduced into the fuel system or vented to the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Collected vapors sent to District approved incineration devices shall be processed through sulfur scrubber(s) prior to incineration. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The sulfur scrubber(s) shall be operated to maintain continued compliance with fuel sulfur content limits on steam generator S-1246-24 and '-354. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Permittee shall cease injection vapors and notify the District immediately if DOGGR vapor disposal well approval is revoked, denied, terminated, surrendered or altered to disallow injection. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Scrubbed well casing vent vapor collection and control system gas burned in 4.2 MMBtu/hr heater treater shall be demonstrated by fuel gas analysis to qualify for permit exemption immediately upon burning TEOR gas in unit and at least every six months thereafter. [District Rule 2020, 8.0] Federally Enforceable Through Title V Permit
11. Fugitive VOC emissions rate for the TEOR operation shall be calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c, Oil and Gas Production Screening Value Ranges Emission Factors (Feb 1999) and the total number of components in gas service including polish rods. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Fugitive VOC emissions rate associated with this TEOR operation shall not exceed 121.8 lb VOC/day. [District Rule 2201] 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 December 14, 2006). [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
14. 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, 5.1.1 and 5.1.2] Federally Enforceable Through Title V Permit
15. An operator shall be in violation of this rule if any District inspection demonstrates that one or more of the following conditions in Section 5.2.2 exist at the facility or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates that one or more of 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, 5.2.1] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

16. 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 or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates that one or more of the conditions in Section 5.2.2 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 2 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 2 of Rule 4401. [District Rule 4401, 5.2.2] Federally Enforceable Through Title V Permit
17. An operator shall source test annually all vapor collection and control systems used to control emissions from steam-enhanced crude oil production well vents to determine the control efficiency of the device(s) used for destruction or removal of VOC. Compliance testing shall be performed annually by source testers certified by ARB. Testing shall be performed during June, July, August, or September of each year if the system's control efficiency is dependent upon ambient air temperature. A process system as defined by Rule 4401 is not subject to compliance source test requirements. [District Rule 4401 6.2.1] Federally Enforceable Through Title V Permit
18. 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 6.2.3] Federally Enforceable Through Title V Permit
19. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4401 6.3.1] Federally Enforceable Through Title V Permit
20. VOC content shall be analyzed by using the latest revision of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be performed by using ARB Method 432. [District Rule 4401 6.3.2] Federally Enforceable Through Title V Permit
21. Leak inspection, other than audio-visual, and measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. Where safety is a concern, such as measuring leaks from compressor seals or pump seals when the shaft is rotating, a person shall measure leaks by placing the instrument probe inlet at a distance of one (1) centimeter or less from the surface of the component interface. [District Rule 4401 6.3.3] Federally Enforceable Through Title V Permit
22. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401 6.3.4] Federally Enforceable Through Title V Permit
23. Gas and liquid leaks are as defined in Section 3.20 of Rule 4401. [District Rule 4401, 3.20] Federally Enforceable Through Title V Permit
24. 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 5.3.1] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

25. 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 5.3.2] Federally Enforceable Through Title V Permit
26. 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 5.3.3] Federally Enforceable Through Title V Permit
27. Except for pipes and unsafe-to-monitor components, an operator shall inspect all other components pursuant to the requirements of Section 6.3.3 of Rule 4401 at least once every year. [District Rule 4401 5.4.1] Federally Enforceable Through Title V Permit
28. An operator shall visually inspect all pipes at least once every year. Any visual inspection of pipes that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected within 24 hours after detecting the leak. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 3 of Rule 4401. [District Rule 4401 5.4.2] Federally Enforceable Through Title V Permit
29. An operator shall inspect for leaks all accessible operating pumps, compressors, and PRDs in service as follows: 1) An operator shall audio-visually (by hearing and by sight) inspect for leaks all accessible operating pumps, compressors, and PRDs in service at least once each calendar week. 2) Any audio-visual inspection of an accessible operating pump, compressor, and PRD performed by an operator that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected not later than 24 hours after conducting the audio-visual inspection. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 4 of this Rule. [District Rule 4401, 5.4.3] Federally Enforceable Through Title V Permit
30. The operator shall also perform the following inspections: 1) An operator shall initially inspect a PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the discovery of the release. An operator shall re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection. 2) An operator shall inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service, and 3) Except for PRDs subject to the requirements of Section 5.8.4.1 of this Rule, an operator shall inspect a component that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. [District Rule 4401, 5.4.4] Federally Enforceable Through Title V Permit
31. An operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401 5.4.5] Federally Enforceable Through Title V Permit
32. District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. [District Rule 4401 5.4.6] Federally Enforceable Through Title V Permit
33. Upon detection of a leak, an operator shall affix a readily visible weatherproof tag to that leaking component that includes the following information: 1) The date and time of leak detection; 2) The date and time of the leak measurement; 3) For a gaseous leak, the leak concentration in ppmv; 4) For a liquid leak, whether it is a major or minor liquid leak; and 5) Whether the component is an essential component, and unsafe-to-monitor component, or a critical component. [District Rule 4401, 5.5.1] Federally Enforceable Through Title V Permit
34. The tag shall remain affixed to the leaky component until all the following requirements are met: 1) The component is repaired or replaced, 2) The component is re-inspected as set forth in Section 6.3, and 3) The component is found to be in compliance with this Rule. [District Rule 4401, 5.5.2] Federally Enforceable Through Title V Permit
35. An operator shall minimize a component leak in order to stop or reduce leakage to the atmosphere immediately to the extent possible, but not later than one (1) hour after detection of the leak. [District Rule 4401 5.5.3] Federally Enforceable Through Title V Permit
36. Except for leaking critical components or leaking essential components subject to the requirements of Section 5.5.7 of Rule 4401, if an operator has minimized a leak but the leak still exceeds the applicable leak limits as defined in Section 3.0 of Rule 4401, an 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 3 of Rule 4401: Repair or replace the leaking component; or vent the leaking component to a VOC collection and control system as defined in Section 3.0 of Rule 4401, or remove the leaking component from operation. [District Rule 5.5.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

37. The repair period in calendar days shall not exceed 14 days for minor gas leaks, 5 days for major gas leaks less than or equal to 50,000 ppmv, 2 days for gas leak greater than 50,000 ppmv, 3 days for minor liquid leaks, 2 days for major liquid leaks. [District Rule 5.5.4] Federally Enforceable Through Title V Permit
38. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period specified in Table 3 of Rule 4401. [District Rule 4401 5.5.5] Federally Enforceable Through Title V Permit
39. The time of the initial leak detection shall be the start of the repair period specified in Table 3 of Rule 4401. [District Rule 4401 5.5.6] Federally Enforceable Through Title V Permit
40. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401 5.5.7] Federally Enforceable Through Title V Permit
41. By January 30 of each year, an operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to an existing Operator Management Plan. [District Rule 4401 6.7] Federally Enforceable Through Title V Permit
42. An inspection and maintenance program consistent with Rule 4409 shall be implemented and maintained for polish rod stuffing boxes (identified by annual well roster required by this permit). [District Rule 2201] Federally Enforceable Through Title V Permit
43. Permittee shall provide District with copy of DOGGR approval of vapor disposal well prior to injecting any TEOR gas. [District Rule 2010] Federally Enforceable Through Title V Permit
44. Permittee shall maintain a written record of inlet and outlet sulfur compound measurements and recharging dates and such records shall be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
45. Permittee shall maintain with the permit a current listing of all steam enhanced wells with casing vents connected to the well vent collection and control system. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
46. Permittee shall maintain accurate component count for TEOR operation according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors. Permittee shall update such records when new components are installed. [District Rule 2201] Federally Enforceable Through Title V Permit
47. Operator shall maintain an inspection log in which an operator records, at a minimum, all of the following information for each inspection performed: The total number of components inspected, total number and percentage of leaking components found by component type, location, type, and name or description of each leaking component and description of any unit where the leaking component is found, date of leak detection and the method of leak detection. 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. the date of repair, replacement, or removal from operation of leaking components, 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, 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, the date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced, the inspector's name, business mailing address, and business telephone number, date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401 6.4] Federally Enforceable Through Title V Permit
48. The operator of any steam-enhanced crude oil production well shall maintain records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401 6.1.1] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

49. An operator of any steam-enhanced crude oil production well shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 6.1.3] Federally Enforceable Through Title V Permit
50. Operator of any steam-enhanced crude oil production well shall keep an inspection log maintained pursuant to Section 6.4 of Rule 4401. [District Rule 4401 6.1.4] Federally Enforceable Through Title V Permit
51. Records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, instrument reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration shall be maintained. [District Rule 4401 6.1.5] Federally Enforceable Through Title V Permit
52. An operator shall maintain copies at the facility of the training records of the training program operated pursuant to Section 6.5 of Rule 4401. [District Rule 4401 6.1.6] Federally Enforceable Through Title V Permit
53. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401 6.1.7] Federally Enforceable Through Title V Permit
54. Operator shall submit to the APCO not later than June 14, 2007 a list of all gauge tanks, as defined in Section 3.17. The list shall contain the size, identification number, the location of each gauge tank and specify whether the gauge tank is upstream of all front line production equipment. [District Rule 4401 6.1.8] Federally Enforceable Through Title V Permit
55. The results of gauge tank TVP testing conducted pursuant to Section 6.2.3 shall be submitted to the APCO within 60 days after the completion of the testing. [District Rule 4401 6.1.9] Federally Enforceable Through Title V Permit
56. An operator that discovers that a PRD has released shall record the date that the release was discovered, and the identity and location of the PRD that released. An operator shall submit such information recorded during the calendar year to the APCO no later than 60 days after the end of the calendar year. [District Rule 4401 6.1.10] Federally Enforceable Through Title V Permit
57. 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 1070, 4401, and 2520, 9.4.2] Federally Enforceable Through Title V Permit
58. Linn Operating Inc shall comply with all applicable District permitting requirements and shall surrender Emission Reduction Credits to offset operational emissions as required by District NSR requirements prior to construction. [Public Resources Code 21000-21177: California Environmental Quality Act]
59. Permittee shall retain records on-site demonstrating compliance with California Department of Fish and Game mitigation measures BIO 1 through 23 to ensure the protection of potential biological species impacts. [Public Resources Code 21000-21177: California Environmental Quality Act]
60. In the event that archaeological/paleontological resources are discovered during ground-disturbing activities associated with construction of the proposed Project, all work within 100 feet of the find shall cease. BPC will notify and retain a qualified archaeologist/paleontologist to assess and provide an evaluation of the significance of the find. BPC shall determine whether avoidance is necessary and feasible in light of the factors such as the nature of the find, project design, costs, and other considerations, and, if necessary, develop appropriate mitigation measures in consultation with Kern County and other appropriate agencies and individuals. Work may resume on the project site once the evaluation of the find is complete by the qualified archaeologist/paleontologist. [Public Resources Code 21000-21177: California Environmental Quality Act]
61. In the event that human remains are discovered during construction of the Project, all work within 100 feet shall be ceased and the discovery will immediately be reported to the County Coroner. If the remains are determined to be Native American in origin, the County Coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours of the determination. The NAHC will solicit those persons it believe to be the nearest descendants of the remains for recommendations. BPC shall, in consultation with the identified descendants of the remains and/or NAHC, will identify the appropriate measures for the treatment or disposition of the remains. [Public Resources Code 21000-21177: California Environmental Quality Act]

CONDITIONS CONTINUE ON NEXT PAGE

62. During construction activities, if unknown, unrecorded or abandoned wells are discovered or if any wells are damaged, BPC shall immediately notify DOGGR. [Public Resources Code 21000-21177: California Environmental Quality Act]
63. Any wells discovered or exposed during construction activities will be tested for flammable vapors. [Public Resources Code 21000-21177: California Environmental Quality Act]
64. ATC shall be implemented concurrently with or subsequent to ATC S-1246-406-0. [District Rule 2201] Federally Enforceable Through Title V Permit

Attachment C  
Application

# San Joaquin Valley Air Pollution Control District

www.valleyair.org

RECEIVED

JUN 29 2015

## Permit Application For:

ADMINISTRATIVE AMENDMENT     MINOR MODIFICATION     SIGNIFICANT MODIFICATION

SJVAPCD  
Southern Region

1. PERMIT TO BE ISSUED TO: <b>Linn Operating, Inc.</b>	
2. MAILING ADDRESS: STREET/P.O. BOX: <b>5201 Truxtun Ave., Suite 100</b>	
CITY: <b>Bakersfield</b>	STATE: <b>CA</b> 9-DIGIT ZIP CODE: <b>93309</b>
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <b>Midway Sunset-North</b> CITY: <b>Taft</b>  1/4 SECTION <b>36</b> TOWNSHIP <b>12N</b> RANGE <b>24W</b>	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: <b>Oil and gas production</b>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)  <b>Implement Authorities to Construct <del>for one steam generator S-1246-406-0,</del> and a TEOR Operation S-1246-290-19</b>	
6. TYPE OR PRINT NAME OF APPLICANT: <b>Shamim Reza</b>	TITLE OF APPLICANT: <b>EH&amp;S Rep.</b>
7. SIGNATURE OF APPLICANT: 	DATE: <b>6/17/15</b>
	PHONE: <b>(661) 616-3889</b> FAX: EMAIL: <b>sreza@linenergy.com</b>

**For APCD Use Only:**

DATE STAMP	<b>NO \$</b>
	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: <u><b>S-1154059</b></u> FACILITY ID: <u><b>S-1246</b></u>

San Joaquin Valley  
Unified Air Pollution Control District

RECEIVED

JUN 29 2015

SJVAPCD  
Southern Region

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION                       ADMINISTRATIVE  
 MINOR PERMIT MODIFICATION                                      AMENDMENT

COMPANY NAME: <b>Linn Operating, Inc.</b>	FACILITY ID: <b>S-1246</b>
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: <b>Linn Operating, Inc.</b>	
3. Agent to the Owner: <b>Tim Crawford</b>	

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

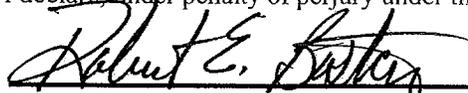
Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).

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

6/9/15

Date

**Robert Boston**

Name of Responsible Official (please print)

**Manager of EHS**

Title of Responsible Official (please print)

Attachment D  
Previous Title V Operating Permit

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1246-290-18

**EXPIRATION DATE:** 03/31/2016

**SECTION:** SE36 **TOWNSHIP:** 12N **RANGE:** 24W

**EQUIPMENT DESCRIPTION:**

TEOR SYSTEM WITH WELL VENT CASING GAS COLLECTION AND CONTROL SYSTEM INCLUDING UP TO 400 STEAM ENHANCED WELLS, GAS/LIQUID SEPARATORS, TRANSFER PUMPS, AIR-COOLED HEAT EXCHANGERS, CONDENSATE TANKS (< 100 BBL), CVR GAS SCRUBBER, VAPOR COMPRESSOR(S), SULFUR SCRUBBER(S), VAPOR PIPING TO FUEL GAS SYSTEM, AND BOOSTER COMPRESSOR WITH DOGGR APPROVED WASTE GAS DISPOSAL WELLS (ETHEL D PROPERTY)

## PERMIT UNIT REQUIREMENTS

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1. Well vent vapor collection and control system includes piping from sulfur scrubber(s) to steam generators S-1246-19, '-24 -269 and -354, and a permit exempt 4.2 MMBtu/hr heater treater. Well vent vapor collection and control system includes bypass piping around sulfur scrubber(s) to booster compressor for up to 3 DOGGR-approved vapor disposal well(s). Only one sulfur scrubber need operate at any time provided compliance with emissions limits have been demonstrated when operating only one sulfur scrubber. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Scrubbed well vent vapor collection and control system (TEOR) gas shall be incinerated only in steam generators S-1246-19, '-24, -269, and -354 and a 4.2 MMBtu/hr heater treater, and unscrubbed gas may be disposed of in up to 3 DOGGR-approved vapor disposal wells. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Sulfur scrubber(s) shall meet at least one of the following performance criteria: sulfur compounds reduction efficiency shall be maintained at 95% or greater, or the sulfur compounds concentration in the vapors exiting the sulfur scrubber(s) shall not exceed 3 ppmv. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Compliance with sulfur scrubber efficiency requirement shall be demonstrated by measurement of total sulfur compound concentrations at scrubber inlet and outlet. The measurement shall be conducted on grab samples taken at scrubber inlet and outlet using one of the following test methods: ASTM D1072, ASTM D3246, ASTM D6228 (GC-FPD), double GC for H<sub>2</sub>S and mercaptans, or equivalent test method with prior District approval. Grab samples shall be taken and analyzed upon initial use of the scrubber and, thereafter, every six months. If scrubber is not in use at six month anniversary date, then efficiency shall be demonstrated within two weeks of returning scrubber to service. For each month in which scrubber is operated and laboratory analysis of grab samples is not required, operator shall monitor and adjust scrubber performance as needed using gas-detection tubes calibrated for existing sulfur species or other equivalent District approved sulfur detection method(s) or device(s). [District Rule 2201] Federally Enforceable Through Title V Permit
5. During recharging of the sulfur scrubber(s), untreated well casing vent collection system vapors shall not be introduced into the fuel system or vented to the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Collected vapors sent to District approved incineration devices shall be processed through sulfur scrubber(s) prior to incineration. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The sulfur scrubber(s) shall be operated to maintain continued compliance with fuel sulfur content limits on steam generator S-1246-24 and '-354. [District Rule 2201] Federally Enforceable Through Title V Permit

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8. Permittee shall cease injection vapors and notify the District immediately if DOGGR vapor disposal well approval is revoked, denied, terminated, surrendered or altered to disallow injection. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Scrubbed well casing vent vapor collection and control system gas burned in 4.2 MMBtu/hr heater treater shall be demonstrated by fuel gas analysis to qualify for permit exemption immediately upon burning TEOR gas in unit and at least every six months thereafter. [District Rule 2020, 8.0] Federally Enforceable Through Title V Permit
10. Fugitive VOC emissions rate for the TEOR operation shall be calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c, Oil and Gas Production Screening Value Ranges Emission Factors (Feb 1999) and the total number of components in gas service including polish rods. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Fugitive VOC emissions rate associated with this TEOR operation shall not exceed 121.8 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 December 14, 2006). [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
13. 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, 5.1.1 and 5.1.2] Federally Enforceable Through Title V Permit
14. An operator shall be in violation of this rule if any District inspection demonstrates that one or more of the following conditions in Section 5.2.2 exist at the facility or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates that one or more of 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, 5.2.1] Federally Enforceable Through Title V Permit
15. 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 or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates that one or more of the conditions in Section 5.2.2 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 2 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 2 of Rule 4401. [District Rule 4401, 5.2.2] Federally Enforceable Through Title V Permit
16. An operator shall source test annually all vapor collection and control systems used to control emissions from steam-enhanced crude oil production well vents to determine the control efficiency of the device(s) used for destruction or removal of VOC. Compliance testing shall be performed annually by source testers certified by ARB. Testing shall be performed during June, July, August, or September of each year if the system's control efficiency is dependent upon ambient air temperature. A process system as defined by Rule 4401 is not subject to compliance source test requirements. [District Rule 4401 6.2.1] Federally Enforceable Through Title V Permit

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17. 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 6.2.3] Federally Enforceable Through Title V Permit
18. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4401 6.3.1] Federally Enforceable Through Title V Permit
19. VOC content shall be analyzed by using the latest revision of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be performed by using ARB Method 432. [District Rule 4401 6.3.2] Federally Enforceable Through Title V Permit
20. Leak inspection, other than audio-visual, and measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. Where safety is a concern, such as measuring leaks from compressor seals or pump seals when the shaft is rotating, a person shall measure leaks by placing the instrument probe inlet at a distance of one (1) centimeter or less from the surface of the component interface. [District Rule 4401 6.3.3] Federally Enforceable Through Title V Permit
21. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401 6.3.4] Federally Enforceable Through Title V Permit
22. Gas and liquid leaks are as defined in Section 3.20 of Rule 4401. [District Rule 4401, 3.20] Federally Enforceable Through Title V Permit
23. 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 5.3.1] Federally Enforceable Through Title V Permit
24. 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 5.3.2] Federally Enforceable Through Title V Permit
25. 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 5.3.3] Federally Enforceable Through Title V Permit
26. Except for pipes and unsafe-to-monitor components, an operator shall inspect all other components pursuant to the requirements of Section 6.3.3 of Rule 4401 at least once every year. [District Rule 4401 5.4.1] Federally Enforceable Through Title V Permit
27. An operator shall visually inspect all pipes at least once every year. Any visual inspection of pipes that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected within 24 hours after detecting the leak. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 3 of Rule 4401. [District Rule 4401 5.4.2] Federally Enforceable Through Title V Permit

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28. An operator shall inspect for leaks all accessible operating pumps, compressors, and PRDs in service as follows: 1) An operator shall audio-visually (by hearing and by sight) inspect for leaks all accessible operating pumps, compressors, and PRDs in service at least once each calendar week. 2) Any audio-visual inspection of an accessible operating pump, compressor, and PRD performed by an operator that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected not later than 24 hours after conducting the audio-visual inspection. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 4 of this Rule. [District Rule 4401, 5.4.3] Federally Enforceable Through Title V Permit
29. The operator shall also perform the following inspections: 1) An operator shall initially inspect a PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the discovery of the release. An operator shall re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection. 2) An operator shall inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service, and 3) Except for PRDs subject to the requirements of Section 5.8.4.1 of this Rule, an operator shall inspect a component that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. [District Rule 4401, 5.4.4] Federally Enforceable Through Title V Permit
30. An operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401 5.4.5] Federally Enforceable Through Title V Permit
31. District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. [District Rule 4401 5.4.6] Federally Enforceable Through Title V Permit
32. Upon detection of a leak, an operator shall affix a readily visible weatherproof tag to that leaking component that includes the following information: 1) The date and time of leak detection; 2) The date and time of the leak measurement; 3) For a gaseous leak, the leak concentration in ppmv; 4) For a liquid leak, whether it is a major or minor liquid leak; and 5) Whether the component is an essential component, and unsafe-to-monitor component, or a critical component. [District Rule 4401, 5.5.1] Federally Enforceable Through Title V Permit
33. The tag shall remain affixed to the leaky component until all the following requirements are met: 1) The component is repaired or replaced, 2) The component is re-inspected as set forth in Section 6.3, and 3) The component is found to be in compliance with this Rule. [District Rule 4401, 5.5.2] Federally Enforceable Through Title V Permit
34. An operator shall minimize a component leak in order to stop or reduce leakage to the atmosphere immediately to the extent possible, but not later than one (1) hour after detection of the leak. [District Rule 4401 5.5.3] Federally Enforceable Through Title V Permit
35. Except for leaking critical components or leaking essential components subject to the requirements of Section 5.5.7 of Rule 4401, if an operator has minimized a leak but the leak still exceeds the applicable leak limits as defined in Section 3.0 of Rule 4401, an 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 3 of Rule 4401: Repair or replace the leaking component; or vent the leaking component to a VOC collection and control system as defined in Section 3.0 of Rule 4401, or remove the leaking component from operation. [District Rule 5.5.4] Federally Enforceable Through Title V Permit
36. The repair period in calendar days shall not exceed 14 days for minor gas leaks, 5 days for major gas leaks less than or equal to 50,000 ppmv, 2 days for gas leak greater than 50,000 ppmv, 3 days for minor liquid leaks, 2 days for major liquid leaks. [District Rule 5.5.4] Federally Enforceable Through Title V Permit
37. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period specified in Table 3 of Rule 4401. [District Rule 4401 5.5.5] Federally Enforceable Through Title V Permit
38. The time of the initial leak detection shall be the start of the repair period specified in Table 3 of Rule 4401. [District Rule 4401 5.5.6] Federally Enforceable Through Title V Permit

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39. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401 5.5.7] Federally Enforceable Through Title V Permit
40. By January 30 of each year, an operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to an existing Operator Management Plan. [District Rule 4401 6.7] Federally Enforceable Through Title V Permit
41. An inspection and maintenance program consistent with Rule 4409 shall be implemented and maintained for polish rod stuffing boxes (identified by annual well roster required by this permit). [District Rule 2201] Federally Enforceable Through Title V Permit
42. Permittee shall provide District with copy of DOGGR approval of vapor disposal well prior to injecting any TEOR gas. [District Rule 2010] Federally Enforceable Through Title V Permit
43. Permittee shall maintain a written record of inlet and outlet sulfur compound measurements and recharging dates and such records shall be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
44. Permittee shall maintain with the permit a current listing of all steam enhanced wells with casing vents connected to the well vent collection and control system. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
45. Permittee shall maintain accurate component count for TEOR operation according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors. Permittee shall update such records when new components are installed. [District Rule 2201] Federally Enforceable Through Title V Permit
46. Operator shall maintain an inspection log in which an operator records, at a minimum, all of the following information for each inspection performed: The total number of components inspected, total number and percentage of leaking components found by component type, location, type, and name or description of each leaking component and description of any unit where the leaking component is found, date of leak detection and the method of leak detection. 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. the date of repair, replacement, or removal from operation of leaking components, 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, 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, the date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced, the inspector's name, business mailing address, and business telephone number, date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401 6.4] Federally Enforceable Through Title V Permit
47. The operator of any steam-enhanced crude oil production well shall maintain records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401 6.1.1] Federally Enforceable Through Title V Permit
48. An operator of any steam-enhanced crude oil production well shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 6.1.3] Federally Enforceable Through Title V Permit
49. Operator of any steam-enhanced crude oil production well shall keep an inspection log maintained pursuant to Section 6.4 of Rule 4401. [District Rule 4401 6.1.4] Federally Enforceable Through Title V Permit

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50. Records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, instrument reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration shall be maintained. [District Rule 4401 6.1.5] Federally Enforceable Through Title V Permit
51. An operator shall maintain copies at the facility of the training records of the training program operated pursuant to Section 6.5 of Rule 4401. [District Rule 4401 6.1.6] Federally Enforceable Through Title V Permit
52. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401 6.1.7] Federally Enforceable Through Title V Permit
53. Operator shall submit to the APCO not later than June 14, 2007 a list of all gauge tanks, as defined in Section 3.17. The list shall contain the size, identification number, the location of each gauge tank and specify whether the gauge tank is upstream of all front line production equipment. [District Rule 4401 6.1.8] Federally Enforceable Through Title V Permit
54. The results of gauge tank TVP testing conducted pursuant to Section 6.2.3 shall be submitted to the APCO within 60 days after the completion of the testing. [District Rule 4401 6.1.9] Federally Enforceable Through Title V Permit
55. An operator that discovers that a PRD has released shall record the date that the release was discovered, and the identity and location of the PRD that released. An operator shall submit such information recorded during the calendar year to the APCO no later than 60 days after the end of the calendar year. [District Rule 4401 6.1.10] Federally Enforceable Through Title V Permit
56. 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 1070, 4401, and 2520, 9.4.2] Federally Enforceable Through Title V Permit
57. Berry Petroleum Company shall comply with all applicable District permitting requirements and shall surrender Emission Reduction Credits to offset operational emissions as required by District NSR requirements prior to construction. [Public Resources Code 21000-21177: California Environmental Quality Act]
58. Permittee shall retain records on-site demonstrating compliance with California Department of Fish and Game mitigation measures BIO 1 through 23 to ensure the protection of potential biological species impacts. [Public Resources Code 21000-21177: California Environmental Quality Act]
59. In the event that archaeological/paleontological resources are discovered during ground-disturbing activities associated with construction of the proposed Project, all work within 100 feet of the find shall cease. BPC will notify and retain a qualified archaeologist/paleontologist to assess and provide an evaluation of the significance of the find. BPC shall determine whether avoidance is necessary and feasible in light of the factors such as the nature of the find, project design, costs, and other considerations, and, if necessary, develop appropriate mitigation measures in consultation with Kern County and other appropriate agencies and individuals. Work may resume on the project site once the evaluation of the find is complete by the qualified archaeologist/paleontologist. [Public Resources Code 21000-21177: California Environmental Quality Act]
60. In the event that human remains are discovered during construction of the Project, all work within 100 feet shall be ceased and the discovery will immediately be reported to the County Coroner. If the remains are determined to be Native American in origin, the County Coroner shall notify the Native American Heritage Commission (NAHC) within 24 hours of the determination. The NAHC will solicit those persons it believe to be the nearest descendants of the remains for recommendations. BPC shall, in consultation with the identified descendants of the remains and/or NAHC, will identify the appropriate measures for the treatment or disposition of the remains. [Public Resources Code 21000-21177: California Environmental Quality Act]
61. During construction activities, if unknown, unrecorded or abandoned wells are discovered or if any wells are damaged, BPC shall immediately notify DOGGR. [Public Resources Code 21000-21177: California Environmental Quality Act]
62. Any wells discovered or exposed during construction activities will be tested for flammable vapors. [Public Resources Code 21000-21177: California Environmental Quality Act]

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