



JUL 09 2013

Mr. Robert Boston
Berry Petroleum Company
5201 Truxtun Avenue, Suite 300
Bakersfield, Ca 93309

Re: Notice of Minor Title V Permit Modification
District Facility # S-1246
Project # 1123658

Dear Mr. Boston:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authorities to Construct (ATCs) S-1246-179-16, '-294-11, '-296-29, and 353-1 into the Title V operating permit. The ATCs authorized modifications to steam generators '-294 and '-353 to increase the sulfur emissions limit and authorize an additional location of operation and modifications of TEOR operations '-179 and '-296 to list additional disposal devices.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authorities to Construct (ATCs) S-1246-179-16, '-294-11, '-296-29, and 353-1, 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.

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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

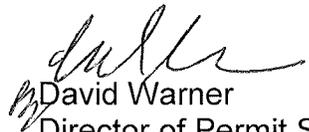
Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

JUL 09 2013

Mr. Robert Boston
Page 2

Thank you for your cooperation in this matter.

Sincerely,


David Warner
Director of Permit Services

Enclosures

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

TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1123658

Engineer: Richard Edgehill
Date: July 2, 2013

Facility Number: S-1246
Facility Name: Berry Petroleum Company
Mailing Address: 5201 Truxtun Avenue, Suite 300
Bakersfield, CA 93309

Contact Name: Bob Boston
Phone: (661) 616-3808
Title: Regulatory Compliance Specialist
Lead Engineer: Alan Phillips

I. PROPOSAL

Berry Petroleum Company is proposing a Title V minor permit modification to incorporate the recently issued Authorities to Construct (ATCs) S-1246-179-16, '-294-11, '-296-29, and '-353-1 into the Title V operating permit. The ATCs authorized the following changes:

ATC S-1246-179-16	INCLUDE STEAM GENERATORS S-1246-345, '-360 AND '-361 AS APPROVED GAS DISPOSAL DEVICES
ATC S-1246-294-11	AUTHORIZE COMBUSTION OF TEOR GAS FROM S-1247-296 AND INCREASE SULFUR LIMIT FROM 1.0 GR S/100 SCF TO 2.1 GR S/100 SCF
ATC S-1246-296-29	LIST STEAM GENERATOR S-1246-294 AS ADDITIONAL COMBUSTION DEVICE
ATC S-1246-353-1	AUTHORIZE ADDITIONAL LOCATION OF OPERATION AT SE SECTION 2, T31S, R22E

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

The authorized equipment is located within Berry's heavy oil production stationary source in the western Kern County fields at the following locations:

ATC S-1246-179-16	Section 21 T30S R22E
ATC S-1246-294-11	NW Section 18, T28S, R21E; NE and SE Section 3, T31S, R22E; NE, SE, and SW Section 2, T31S, R22E; Section 11, T31S, 22E; & SE Sections 24, T31S, R22E
ATC S-1246-296-29	Sections 1, 2, 3, 11, and 12 T31S, R22E
ATC S-1246-353-1	Unit is approved for operation only at NW Section 21, T30S, R22E and SE Section 2, T31S, R22E.

III. EQUIPMENT DESCRIPTION

PTO S-1246-179-17: THERMALLY ENHANCED OIL RECOVERY OPERATION WELL VENT VAPOR CONTROL SYSTEM SERVING 200 STEAM ENHANCED WELLS

PTO S-1246-294-12: 85 MMBTU/HR NATURAL/ETHANE RICH/TEOR GAS-FIRED STEAM GENERATOR (MNJ-405) WITH NORTH AMERICAN 4231-85-GLE ULTRA LOW NOX BURNER (SERIAL # 2097309), FGR, AND O2 CONTROLLER (GEN SITE 1824)

PTO S-1246-296-36: THERMALLY ENHANCED OIL RECOVERY (TEOR) OPERATION WELL VENT VAPOR CONTROL SYSTEM SERVING 1200 WELLS INCLUDING GAS/LIQUID SEPARATORS, HEAT EXCHANGERS, COMPRESSORS, INLET SEPARATOR VESSELS, CONDENSATE PUMPS, SULFUR SCRUBBER, VAPOR PIPING FROM TANKS '337 AND '339 AND VAPOR PIPING TO STEAM GENERATORS S-1246-3, '-24, '-46, '-119, '-292, '-293, '-294, '-342, '-343, '-344, '-345, '-346, '-355, '-356, '-357, '-358, '-359 AND/OR DOGGR APPROVED GAS DISPOSAL WELLS (NMWSS)

Berry Petroleum Company
Facility ID: S-1246
Project No.: S-1123658

PTO S-1246-353-2: 85 MMBTU/HR NATURAL/ETHANE-RICH
NATURAL/TEOR/TVR GAS-FIRED STEAM GENERATOR
(MNJ-427) WITH A NORTH AMERICAN MAGNA FLAME
LE ULTRA LOW NOX BURNER (OR EQUIVALENT), FLUE
GAS RECIRCULATION (FGR) AND AN O2 CONTROLLER

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 draft PTO and current PTO is provided below.

Berry Petroleum Company
 Facility ID: S-1246
 Project No.: S-1123658

S-1246-179

Draft PTO	Current PTO	Comments
S-1246-179-17	S-1246-179-10	
1	1	Draft PTO includes updated listing of steam generator disposal devices ('-345, '-352, '-353, '-360, and '-361)
2,3	2,3	
4		Rule 4401 leak definition erroneously absent from current PTO
5	4	
6	5,6	Rule 4401 99% control conditions updated into one condition
7	7	Updated Rule 4401 open ended line/valve condition
8	8,9,10	Updated leak condition
9-32	11-34	
33,34		Gauge tank conditions not listed on current PTO
35,36	35,36	
37	37-39	Updated control efficiency and reporting conditions
38-47	40-49	

Berry Petroleum Company
 Facility ID: S-1246
 Project No.: S-1123658

S-1246-294

Draft PTO	Current PTO	Comments
S-1246-294-12	S-1246-294-10	
1-5	1-5	
6	6	Fuel type condition revised
7,8	8,9	
9	10	Sulfur limit revised
10,11,12	11,12,13	
13	7	
14,15		New sulfur monitoring conditions
16-23	14-21	
	22	Annual S testing requirement replaced by Conditions 14,15
24-33	23-32	

Berry Petroleum Company
 Facility ID: S-1246
 Project No.: S-1123658

S-1246-296 (Rule 4401 Section numbers updated on draft PTO)

Draft PTO	Current PTO	Comments
S-1246-296-36	S-1246-296-21	
1-6	1-6	
7	7	VOC DEL revised
8,9	8,9	Annual inspection requirements draft PTO includes "annual"
10,11	11,12	
12	10	
13-35	13-35	
36	46	
37-39	37-39	
40-41		EPA reporting requirements
42-47	40-45	
	47	Record-keeping requirement of gauge tanks – not relevant
	48	Operating Plan annual reporting requirement to APCO not required
48	49	
49	50	
50	51	
51	52	
52	53	
53,54	54,55	

S-1246-353

The draft PTO S-1246-353-2 includes all conditions listed on ATC S-1246-353-1 with the exception of the Title V Minor Modification application requirement (Condition #1) and the requirement to implement the ATC only after ATC S-1246-353-0 (last condition). ATC S-1246-353-0 has been implemented and will be converted to PTO prior to or concurrently with conversion of draft PTO S-1246-353-2.

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(l)(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

Berry Petroleum Company
Facility ID: S-1246
Project No.: S-1123658

3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Title V PTOs S-1246-179-17, '-294-12, '-296-36, '-353-2
- B. Authorities to Construct S-1246-179-16, '-294-11, '-296-29, '-353-1
- C. Permit Application
- D. Previous Title V (draft) PTOs S-1246-179-10, '-294-10, and '-296-21

Berry Petroleum Company
Facility ID: S-1246
Project No.: S-1123658

ATTACHMENT A

Proposed Title V PTOs

S-1246-179-17, '-294-12, '-296-36, '-353-2

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1246-179-17

EXPIRATION DATE: 03/31/2016

SECTION: 21 **TOWNSHIP:** 30S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

THERMALLY ENHANCED OIL RECOVERY OPERATION WELL VENT VAPOR CONTROL SYSTEM SERVING 200 STEAM ENHANCED WELLS

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PERMIT UNIT REQUIREMENTS

1. All uncondensed VOC emissions collected by vapor collection and control system shall be incinerated in District approved steam generators S-1246-46, '-292, '-345, '-352, '-353, '-360 and '-361. [District Rules 2201 and 4401, 5.1 and 5.2] Federally Enforceable Through Title V Permit
2. Permittee shall maintain an accurate component count and resulting emissions calculations in accordance with CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Ranges emission factors. Permittee shall update such records when new components are installed. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Fugitive emissions from all components in gas service associated with this TEOR operation shall not exceed 84.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. 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
5. 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
6. 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
7. 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, 5.2.2] 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.

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8. 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 3 of Rule 4401, or a gas leak greater than 10,000 ppmv up to 50,000 ppmv in excess of the allowable number of leaks allowed by Table 3 of Rule 4401. [District Rule 4401, 5.2.2] Federally Enforceable Through Title V Permit
9. No leaking components (as defined in Section 5.2.2 of Rule 4401) may be used unless they have been identified with a tag for repair, are repaired, or awaiting re-inspection after being repaired within the applicable time frame specified in Section 5.5. [District Rule 4401, 5.7.1] Federally Enforceable Through Title V Permit
10. Each hatch shall be closed at all times except during attended repair, replacement, or maintenance operations, providing such activities are done as expeditiously as possible with minimal spillage or material and VOC emissions into the atmosphere. [District Rule 4401, 5.3.2] Federally Enforceable Through Title V Permit
11. The operator shall comply with the requirements of Section 6.7 if there is any change in the description of major components or critical components. [District Rule 4401, 5.3.3] Federally Enforceable Through Title V Permit
12. Unless otherwise specified in Section 5.4, an operator shall perform all component inspections and gas leak measurements pursuant to the requirements of Section 6.3.3. [District Rule 4401, 5.4] Federally Enforceable Through Title V Permit
13. Except for pipes and unsafe-to-monitor components, an operator shall inspect all other components pursuant to the requirements of Section 6.3.3 at least once every year. [District Rule 4401, 5.4.1] Federally Enforceable Through Title V Permit
14. 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 4 of this Rule. [District Rule 4401, 5.4.2] Federally Enforceable Through Title V Permit
15. 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
16. The operator shall also perform the following inspections: 1) An operator shall initially inspect a PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the discovery of the release. An operator shall re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection. 2) An operator shall inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service, and 3) Except for PRDs subject to the requirements of Section 5.4.4.1 of this Rule, an operator shall inspect a component that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. [District Rule 4401, 5.4.4] Federally Enforceable Through Title V Permit
17. Components located in unsafe areas shall be inspected and repaired at the next process unit turnaround and inaccessible components shall be inspected at least annually. [District Rule 4401, 5.4.7] Federally Enforceable Through Title V Permit
18. A District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. [District Rule 4401, 5.4.8] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

19. 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
20. 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
21. 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
22. 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 4401, 5.5.4] Federally Enforceable Through Title V Permit
23. The repair period in calendar days shall not exceed 14 days for minor gas leaks, 5 days for major gas leaks less than or equal to 50,000 ppmv, 2 days for gas leak greater than 50,000 ppmv, 3 days for minor liquid leaks, 2 days for major liquid leaks. [District Rule 4401, 5.5.4] Federally Enforceable Through Title V Permit
24. 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
25. 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
26. 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
27. 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
28. An operator of any steam-enhanced crude oil production well shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401, 6.1.3] Federally Enforceable Through Title V Permit
29. The operator of any steam-enhanced crude oil production well shall maintain an inspection log pursuant to Section 6.4 of Rule 4401. [District Rule 4401, 6.1.4] Federally Enforceable Through Title V Permit
30. Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, instrument reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration [District Rule 4401, 6.1.5] Federally Enforceable Through Title V Permit
31. 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
32. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

33. Operator shall keep a list of all gauge tanks, as defined in Section 3.0. 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
34. 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
35. 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
36. An operator shall source test annually all vapor collection and control systems used to control emissions from steam-enhanced crude oil production well vents to determine the control efficiency of the device(s) used for destruction or removal of VOC. Compliance testing shall be performed annually by source testers certified by ARB. Testing shall be performed during June, July, August, or September of each year if the system's control efficiency is dependent upon ambient air temperature. [District Rule 4401, 6.2.1] Federally Enforceable Through Title V Permit
37. If approved by the APCO, a VOC collection and control system is not subject to Section 6.2.1 if all uncondensed VOC emissions collected by the system are controlled by a device meeting one of the following requirements: 1) an internal combustion engine subject to District Rule 4702 (Internal Combustion Engines - Phase 2); or 2) A combustion device subject to District Rule 4320 (Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr); District Rule 4307 (Boilers, Steam Generators, and Process Heaters - 2.0MMBtu/hr to 5.0 MMBtu/hr); or District Rule 4308 (Boilers, Steam Generators, and Process Heaters - 0.075 MMBtu/hr to 2.0 MMBtu/hr); or 3) a unit subject to District Rule 4311. [District Rule 4401, 6.2.2] Federally Enforceable Through Title V Permit
38. An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.17 of Rule 4401: Conduct an initial TVP testing of the produced fluid in each gauge tank not later than June 14, 2007. Thereafter, an operator shall conduct periodic TVP testing of each gauge tank at least once every 24 months during summer (July - September), and whenever there is a change in the source or type of produced fluid in the gauge tank. The TVP testing shall be conducted at the actual storage temperature of the produced fluid in the gauge tank using the applicable TVP test method specified in Section 6.4 of Rule 4623 (Storage of Organic Liquids). The operator shall submit the TVP testing results to the APCO as specified in Section 6.1.9 of Rule 4401. [District Rule 4401, 6.2.3] Federally Enforceable Through Title V Permit
39. 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
40. 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
41. 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

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

42. 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
43. The operator shall maintain an inspection log in which the operator records at least all of the following for each inspection performed: 1) The total number of components inspected, and the total number and percentage of leaking components found by component type, 2) The location, type and name or description of each leaking component and description of any unit where the leaking component is found, 3) The date of leak detection and the method of leak detection, 4) For gaseous leaks, the leak concentration in ppmv and, for liquids leaks, whether the leak is major or minor, 5) The date of repair, replacement or removal from operation of leaking components, 6) The identity and location of essential components and critical components as defined in this Rule, found leaking, that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier, 7) The methods used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than 1 year after detection, whichever comes earlier, 8) The date or re-inspection and the leak concentration in ppmv after the component is repaired or replaced, 9) The inspectors name, business mailing address, and business telephone number, and 10) The date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401, 6.4] Federally Enforceable Through Title V Permit
44. The operator shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures as necessary. [District Rule 4401, 6.5] Federally Enforceable Through Title V Permit
45. 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
46. All records of required monitoring data and support information shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rules 2520, 9.4.2 and 4401, 6.1] Federally Enforceable Through Title V Permit
47. The crude oil production wells associated with this unit do not have production enhanced by in-situ combustion. Therefore, the requirements of SJVUAPCD Rule 4407 (Adopted May 19, 1994) do not apply to this permit unit. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1246-294-12

EXPIRATION DATE: 03/31/2016

SECTION: SE3 **TOWNSHIP:** 31S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

85 MMBTU/HR NATURAL/ETHANE RICH/TEOR GAS-FIRED STEAM GENERATOR (MNJ-405) WITH NORTH AMERICAN 4231-85-GLE ULTRA LOW NOX BURNER (SERIAL # 2097309), FGR, AND O2 CONTROLLER (GEN SITE 1824)

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Unit is approved for operation at the following locations: NW Section 18, T28S, R21E; NE and SE Section 3, T31S, R22E; NE, SE, and SW Section 2, T31S, R22E; Section 11, T31S, 22E; & SE Sections 24, T31S, R22E. [District Rule 4102]
3. Permittee shall notify the District Compliance Division of each location at which the unit is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 1070] Federally Enforceable Through Title V Permit
4. The duration of each startup and shutdown period shall not exceed 2.0 hours. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
5. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
6. This unit shall be fired on natural gas, ethane rich gas, and/or TEOR gas treated treated to remove 95% by weight of sulfur compounds or treated such that the sulfur content does not exceed 1 gr of sulfur compounds (as S) per 100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The higher heating value of each non-certified fuel shall be certified by a third party fuel supplier or determined by ASTM D1826 or D1945 in conjunction with ASTM D 3588. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
8. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
9. The maximum fuel content shall not exceed 2.1 gr S/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Except for periods of startup and shutdown, emissions from the natural gas-fired unit shall not exceed any of the following limits: 7 ppmvd NOx @ 3% O2 or 0.008 lb-NOx/MMBtu, 0.0076 lb-PM10/MMBtu, 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. Maximum NOx emissions from the steam generator, including start-up and shutdown, shall not exceed 19.7 lb-NOx/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
13. At least quarterly, the permittee shall monitor using the methods specified in this permit the higher heating value of each non-certified fuel supplied to this unit, or, alternatively, have the higher heating value certified by the fuel supplier. The records of higher heating value and quantity of fuel combusted shall be used to demonstrate that the rated heat input capacity of this unit, as averaged over a calendar quarter, is not exceeded. [District Rules 2201] Federally Enforceable Through Title V Permit
14. Permittee shall determine sulfur content of combusted gas weekly for eight consecutive weeks. After demonstrating compliance for eight consecutive weeks testing may be conducted on a quarterly basis. Weekly sulfur testing shall resume if quarterly testing does not indicate compliance. Weekly gas analysis shall be performed using Draeger tubes and quarterly analysis using ASTM method D3246 or double GC for H2S and mercaptans. First of the weekly gas analyses shall be done using laboratory analysis. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
15. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
16. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

20. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. Source testing to measure NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
22. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
23. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
24. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
26. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
29. {1656} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
30. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (12/17/92); 4601, sections 5.1, 5.2, 5.4, 5.5, 6.1, and 6.2 (10/31/01); 8021 (11/15/01); 8031 (11/15/01); 8061 (11/15/01); A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
31. Daily records of start-up and shutdown durations and number of occurrences of each shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
32. Permittee shall maintain monthly records of all fuel sources combusted in this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
33. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1246-296-36

EXPIRATION DATE: 03/31/2016

SECTION: 02 **TOWNSHIP:** 31S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

THERMALLY ENHANCED OIL RECOVERY (TEOR) OPERATION WELL VENT VAPOR CONTROL SYSTEM SERVING 1200 WELLS INCLUDING GAS/LIQUID SEPARATORS, HEAT EXCHANGERS, COMPRESSORS, INLET SEPARATOR VESSELS, CONDENSATE PUMPS, SULFUR SCRUBBER, VAPOR PIPING FROM TANKS '337 AND '339 AND VAPOR PIPING TO STEAM GENERATORS S-1246-3, '-24, '-46, '-119, '-292, '-293, '-294, '-342, '-343, '-344, '-345, '-346, '-355, '-356, '-357, '-358, '-359 AND/OR DOGGR APPROVED GAS DISPOSAL WELLS (NMWSS)

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. TEOR operation is authorized to operate at the following locations: Sections 1, 2, 3, 11, and 12 T31S, R22E. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Well vent vapor from this TEOR operation shall only be incinerated in approved steam generators or disposed of in DOGGR approved gas disposal wells. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Well vent vapor from this TEOR operation shall not be incinerated in approved steam generators unless it is first scrubbed in a fuel gas sulfur scrubber and sulfur compounds are reduced by a minimum of 95%. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Compliance with scrubber sulfur removal 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 D3246 or double GC for H₂S 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 NSR Rule] Federally Enforceable Through Title V Permit
6. Well vent vapor collection and control system includes piping from sulfur scrubbers to District approved incinerating devices. Well vent vapor collection and control system includes bypass piping around sulfur scrubbers to DOGGR-approved vapor disposal well(s). [District NSR Rule] Federally Enforceable Through Title V Permit
7. Fugitive VOC emissions rate for the TEOR operation, 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/light liquid service, shall not exceed 345.6 lb-VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: BERRY PETROLEUM COMPANY

Location: HEAVY OIL WESTERN STATIONARY SOURCE, KERN COUNTY, CA

S-1246-296-36 : Jul 2 2013 11:04AM - EDGEHILR

9. The annual inspection requirements of Section 5.8.1 through Section 5.8.5 of Rule 4401 shall not apply to components exclusively handling gas/vapor or liquid with a VOC content of ten percent by weight (10 wt %) or less, as determined by the test methods in Section 6.3.5 of Rule 4401. [District Rule 4401 4.9] Federally Enforceable Through Title V Permit
10. An operator shall not operate a steam-enhanced crude oil production well unless the operator complies with the following requirements: The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401, the well vent may be temporarily opened during periods of attended service or repair of the well provided such activity is done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere, the steam-enhanced crude oil production well vent is open and the well vent is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401, 5.5.1 and 5.5.2] Federally Enforceable Through Title V Permit
11. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.8 of Rule 4401 demonstrates the existence of a component with a major liquid leak, a component with a gas leak greater than 50,000 ppmv, or 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 5.6.2.1 of Rule 4401 requiring process fluid flow through the open-ended lines. [District Rule 4401 5.6.2] Federally Enforceable Through Title V Permit
12. 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
13. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.8 of Rule 4401 demonstrates the existence of any combination of components with minor liquid leaks, minor gas leaks, or gas leaks greater than 10,000 ppmv up to 50,000 ppmv that totals more than number of leaks allowed by Table 3 of Rule 4401. [District Rule 4401 5.6.2] Federally Enforceable Through Title V Permit
14. 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 5.6.2 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 5.9 of Rule 4401. [District Rule 4401 5.7.1] Federally Enforceable Through Title V Permit
15. 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 5.7.2] Federally Enforceable Through Title V Permit
16. 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 5.7.3] Federally Enforceable Through Title V Permit
17. 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 5.8.1] Federally Enforceable Through Title V Permit
18. 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 4 of Rule 4401. [District Rule 4401 5.8.2] 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.

19. In addition to the inspections required by Section 5.8.1 of Rule 4401, an operator shall inspect for leaks all accessible operating pumps, compressors, and PRDs in service as follows: 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. 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 Rule 4401. [District Rule 4401 5.8.3] Federally Enforceable Through Title V Permit
20. In addition to the inspections required by Sections 5.8.1, 5.8.2 and 5.8.3 of Rule 4401, operator shall perform the following: 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, re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection, inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. Except for PRDs subject to the requirements of Section 5.8.4.1 of Rule 4401, 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 5.8.4] Federally Enforceable Through Title V Permit
21. An operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401 5.8.5] Federally Enforceable Through Title V Permit
22. 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 5.8.6] Federally Enforceable Through Title V Permit
23. An operator shall affix a readily visible weatherproof tag to a leaking component upon detection of the leak and shall include the following information on the tag: date and time of leak detection, date and time of leak measurement, for a gaseous leak, the leak concentration in ppmv, for a liquid leak, whether it is a major liquid leak or a minor liquid leak, whether the component is an essential component, an unsafe-to monitor component, or a critical component. [District Rule 4401 5.9.1] Federally Enforceable Through Title V Permit
24. An operator shall keep the tag affixed to the component until an operator has met all of the following conditions: repaired or replaced the leaking component, re-inspected the component using the test method in Section 6.3.3, and 5.9.2.3 of Rule 4401, or the component is found to be in compliance with the requirements of this rule. [District Rule 4401 5.9.2] Federally Enforceable Through Title V Permit
25. 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 5.9.3] Federally Enforceable Through Title V Permit
26. Except for leaking critical components or leaking essential components subject to the requirements of Section 5.9.7 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 4 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 4401 5.9.4] Federally Enforceable Through Title V Permit
27. The repair period in calendar days shall not exceed 14 days for minor gas leaks, 5 days for major gas leaks less than or equal to 50,000 ppmv, 2 days for gas leak greater than 50,000 ppmv, 3 days for minor liquid leaks, 2 days for major liquid leaks. [District Rule 4401 5.9.4] Federally Enforceable Through Title V Permit
28. 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 4 of Rule 4401. [District Rule 4401 5.9.5] Federally Enforceable Through Title V Permit
29. The time of the initial leak detection shall be the start of the repair period specified in Table 4 of Rule 4401. [District Rule 4401 5.9.6] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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30. 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 5.9.7] Federally Enforceable Through Title V Permit
31. 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
32. An operator of any steam-enhanced crude oil production well shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401 6.1.3] Federally Enforceable Through Title V Permit
33. 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 6.1.5] Federally Enforceable Through Title V Permit
34. 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 6.1.6] Federally Enforceable Through Title V Permit
35. 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 6.1.7] Federally Enforceable Through Title V Permit
36. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401 6.1.8] Federally Enforceable Through Title V Permit
37. 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 6.1.11] Federally Enforceable Through Title V Permit
38. An operator shall source test annually all vapor collection and control systems used to control emissions from steam-enhanced crude oil production well vents to determine the control efficiency of the device(s) used for destruction or removal of VOC. Compliance testing shall be performed annually by source testers certified by ARB. Testing shall be performed during June, July, August, or September of each year if the system's control efficiency is dependent upon ambient air temperature. [District Rule 4401 6.2.1] Federally Enforceable Through Title V Permit
39. If approved by EPA, ARB, and the APCO, an operator need not comply with the annual testing requirement of Section 6.2.1 if all uncondensed VOC emissions collected by a vapor collection and control system are incinerated in fuel burning equipment, an internal combustion engine or in a smokeless flare. [District Rule 4401 6.2.2] Federally Enforceable Through Title V Permit
40. If approved by EPA, ARB, and the APCO, an operator need not comply with the annual testing requirement of Section 6.2.1 for a vapor control system which does not have a VOC destruction device. [District Rule 4401 6.2.3] Federally Enforceable Through Title V Permit
41. An operator seeking approval pursuant to Section 6.2.2 or Section 6.2.3 shall submit a written request and supporting information to the APCO. [District Rule 4401 6.2.4] Federally Enforceable Through Title V Permit
42. An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.17 of Rule 4401: Conduct an initial TVP testing of the produced fluid in each gauge tank not later than June 14, 2007. Thereafter, an operator shall conduct periodic TVP testing of each gauge tank at least once every 24 months during summer (July - September), and whenever there is a change in the source or type of produced fluid in the gauge tank. The TVP testing shall be conducted at the actual storage temperature of the produced fluid in the gauge tank using the applicable TVP test method specified in Section 6.4 of Rule 4623 (Storage of Organic Liquids). The operator shall submit the TVP testing results to the APCO as specified in Section 6.1.10 of Rule 4401. [District Rule 4401 6.2.5] 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.

43. 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
44. 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
45. 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
46. 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 6.3.5] 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. All records of required monitoring data and support information shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rules 2520, 9.4.2 and 4401, 6.1] Federally Enforceable Through Title V Permit
49. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
50. Collected vapors shall be disposed of in District approved incineration devices, as listed on this permit, or in Department of Oil, Gas and Geothermal Resources (DOGGR) approved vapor disposal wells. Permittee shall make documentation of DOGGR approval for injection wells readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
51. The operator shall maintain records of the fugitive component count and calculated VOC emissions. [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.

52. 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 NSR Rule] Federally Enforceable Through Title V Permit
53. 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
54. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

DRAFT

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1246-353-2

EXPIRATION DATE: 03/31/2016

SECTION: SW 2 **TOWNSHIP:** 31S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

85 MMBTU/HR NATURAL/ETHANE-RICH NATURAL/TEOR/TVR GAS-FIRED STEAM GENERATOR (MNJ-427) WITH A NORTH AMERICAN MAGNA FLAME LE ULTRA LOW NOX BURNER (OR EQUIVALENT), FLUE GAS RECIRCULATION (FGR) AND AN O2 CONTROLLER

PERMIT UNIT REQUIREMENTS

1. 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]
2. 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]
3. 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]
4. 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]
5. Any wells discovered or exposed during construction activities will be tested for flammable vapors. [Public Resources Code 21000-21177: California Environmental Quality Act]
6. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
7. This unit shall be equipped with horizontal convection section with at least 235 square feet of bare tube surface area (or thermodynamically equivalent number of square feet of finned tube) per MMBtu/hr of heat input. [Public Resources Code 21000-21177: California Environmental Quality Act]
8. This unit shall be equipped with variable frequency drive high efficiency electrical motors driving the blower and water pump. [Public Resources Code 21000-21177: California Environmental Quality Act]
9. Unit is approved for operation only at NW Section 21, T30S, R22E and SE and SW Section 2, T31S, R22E. [District Rule 4102]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
11. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
12. This unit shall be fired on natural gas, TEOR gas, and/or TVR gas treated to remove 95% by weight of sulfur compounds or treated such that the sulfur content does not exceed 1 gr of sulfur compounds (as S) per 100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The maximum fuel sulfur content shall not exceed 1.75 gr S/100scf. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The higher heating value of each non-certified fuel shall be certified by a third party fuel supplier or determined by ASTM D1826 or D1945 in conjunction with ASTM D 3588. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
15. Except for periods of startup and shutdown, emissions from the natural gas-fired unit shall not exceed any of the following limits: 7 ppmvd NO_x @ 3% O₂ or 0.0085 lb-NO_x/MMBtu, 0.005 lb-PM₁₀/MMBtu, 35 ppmvd CO @ 3% O₂ or 0.026 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4201, 4301, 4305, 4306, 4320, and 4801] Federally Enforceable Through Title V Permit
16. Maximum NO_x emissions from the steam generator, including start-up and shutdown, shall not exceed 19.7 lb-NO_x/day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. Source testing to measure natural gas-combustion NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months thereafter. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
22. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
23. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
24. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

25. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
26. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320] Federally Enforceable Through Title V Permit
27. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
29. At least quarterly, the permittee shall monitor using the methods specified in this permit the higher heating value of each non-certified fuel supplied to this unit, or, alternatively, have the higher heating value certified by the fuel supplier. The records of higher heating value and quantity of fuel combusted shall be used to demonstrate that the rated heat input capacity of this unit, as averaged over a calendar quarter, is not exceeded. [District Rules 2201] Federally Enforceable Through Title V Permit
30. Permittee shall determine sulfur content of combusted gas weekly for eight consecutive weeks. After demonstrating compliance for eight consecutive weeks testing may be conducted on a quarterly basis. Weekly sulfur testing shall resume if quarterly testing does not indicate compliance. Weekly gas analysis shall be performed using Draeger tubes and quarterly analysis using ASTM method D3246 or double GC for H₂S and mercaptans. First of the weekly gas analyses shall be done using laboratory analysis. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
31. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
32. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
33. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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

34. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
35. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
36. Permittee shall maintain monthly records of gas combusted in this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
37. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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

DRAFT

ATTACHMENT B

Authorities to Construct

S-1246-179-16, '-294-11, '-296-29, '-353-1

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1246-179-16

ISSUANCE DATE: 10/29/2012

LEGAL OWNER OR OPERATOR: BERRY PETROLEUM COMPANY
MAILING ADDRESS: 5201 TRUXTUN AVENUE SUITE 100
ATTN: EH&S MANAGER
BAKERSFIELD, CA 93309-0422

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
KERN COUNTY, CA

SECTION: 21 TOWNSHIP: 30S RANGE: 22E

EQUIPMENT DESCRIPTION:

MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY OPERATION WELL VENT VAPOR CONTROL SYSTEM SERVING 200 STEAM ENHANCED WELLS: INCLUDE STEAM GENERATORS S-1246-345, '-360 AND '-361 AS APPROVED GAS DISPOSAL DEVICES

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. All uncondensed VOC emissions collected by vapor collection and control system shall be incinerated in District approved steam generators S-1246-46, '-292, '-352, '-353, '-345, '-360 and '-361. [District Rules 2201 and 4401, 5.1 and 5.2]
3. Permittee shall maintain an accurate component count and resulting emissions calculations in accordance with CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Ranges emission factors. Permittee shall update such records when new components are installed. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Fugitive emissions from all components in gas service associated with this TEOR operation shall not exceed 84.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Gas and liquid leaks are as defined in Section 3.20 of Rule 4401. [District Rule 4401, 3.20]

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

S-1246-179-16 : Jul 2 2013 2:11PM -- EDGEHLR : Joint Inspection NOT Required

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

6. 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]
7. An operator shall not operate a steam-enhanced crude oil production well unless the operator complies with the following requirements: The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401, the well vent may be temporarily opened during periods of attended service or repair of the well provided such activity is done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere, the steam-enhanced crude oil production well vent is open and the well vent is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401, 5.1.1 and 5.1.2]
8. 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, 5.2.2]
9. 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 3 of Rule 4401, or a gas leak greater than 10,000 ppmv up to 50,000 ppmv in excess of the allowable number of leaks allowed by Table 3 of Rule 4401. [District Rule 4401, 5.2.2]
10. No leaking components (as defined in Section 5.2.2 of Rule 4401) may be used unless they have been identified with a tag for repair, are repaired, or awaiting re-inspection after being repaired within the applicable time frame specified in Section 5.5. [District Rule 4401, 5.7.1] Federally Enforceable Through Title V Permit
11. Each hatch shall be closed at all times except during attended repair, replacement, or maintenance operations, providing such activities are done as expeditiously as possible with minimal spillage or material and VOC emissions into the atmosphere. [District Rule 4401, 5.3.2] Federally Enforceable Through Title V Permit
12. The operator shall comply with the requirements of Section 6.7 if there is any change in the description of major components or critical components. [District Rule 4401, 5.3.3] Federally Enforceable Through Title V Permit
13. Unless otherwise specified in Section 5.4, an operator shall perform all component inspections and gas leak measurements pursuant to the requirements of Section 6.3.3. [District Rule 4401, 5.4] Federally Enforceable Through Title V Permit
14. Except for pipes and unsafe-to-monitor components, an operator shall inspect all other components pursuant to the requirements of Section 6.3.3 at least once every year. [District Rule 4401, 5.4.1] Federally Enforceable Through Title V Permit
15. 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 4 of this Rule. [District Rule 4401, 5.4.2] Federally Enforceable Through Title V Permit
16. 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

CONDITIONS CONTINUE ON NEXT PAGE

17. The operator shall also perform the following inspections: 1) An operator shall initially inspect a PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the discovery of the release. An operator shall re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection. 2) An operator shall inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service, and 3) Except for PRDs subject to the requirements of Section 5.4.4.1 of this Rule, an operator shall inspect a component that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. [District Rule 4401, 5.4.4] Federally Enforceable Through Title V Permit
18. Components located in unsafe areas shall be inspected and repaired at the next process unit turnaround and inaccessible components shall be inspected at least annually. [District Rule 4401, 5.4.7] Federally Enforceable Through Title V Permit
19. A District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. [District Rule 4401, 5.4.8] Federally Enforceable Through Title V Permit
20. 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
21. 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
22. 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
23. 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 4401, 5.5.4]
24. The repair period in calendar days shall not exceed 14 days for minor gas leaks, 5 days for major gas leaks less than or equal to 50,000 ppmv, 2 days for gas leak greater than 50,000 ppmv, 3 days for minor liquid leaks, 2 days for major liquid leaks. [District Rule 4401, 5.5.4] Federally Enforceable Through Title V Permit
25. 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]
26. 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]
27. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401, 5.5.7] Federally Enforceable Through Title V Permit
28. 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
29. An operator of any steam-enhanced crude oil production well shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401, 6.1.3] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

30. The operator of any steam-enhanced crude oil production well shall maintain an inspection log pursuant to Section 6.4 of Rule 4401. [District Rule 4401, 6.1.4] Federally Enforceable Through Title V Permit
31. Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, instrument reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration [District Rule 4401, 6.1.5] Federally Enforceable Through Title V Permit
32. 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
33. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401, 6.1.7]
34. Operator shall keep a list of all gauge tanks, as defined in Section 3.0. 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]
35. 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]
36. 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]
37. An operator shall source test annually all vapor collection and control systems used to control emissions from steam-enhanced crude oil production well vents to determine the control efficiency of the device(s) used for destruction or removal of VOC. Compliance testing shall be performed annually by source testers certified by ARB. Testing shall be performed during June, July, August, or September of each year if the system's control efficiency is dependent upon ambient air temperature. [District Rule 4401, 6.2.1] Federally Enforceable Through Title V Permit
38. If approved by the APCO, a VOC collection and control system is not subject to Section 6.2.1 if all uncondensed VOC emissions collected by the system are controlled by a device meeting one of the following requirements: 1) an internal combustion engine subject to District Rule 4702 (Internal Combustion Engines - Phase 2); or 2) A combustion device subject to District Rule 4320 (Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr); District Rule 4307 (Boilers, Steam Generators, and Process Heaters - 2.0MMBtu/hr to 5.0 MMBtu/hr); or District Rule 4308 (Boilers, Steam Generators, and Process Heaters - 0.075 MMBtu/hr to 2.0 MMBtu/hr); or 3) a unit subject to District Rule 4311. [District Rule 4401, 6.2.2]
39. An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.17 of Rule 4401: Conduct an initial TVP testing of the produced fluid in each gauge tank not later than June 14, 2007. Thereafter, an operator shall conduct periodic TVP testing of each gauge tank at least once every 24 months during summer (July - September), and whenever there is a change in the source or type of produced fluid in the gauge tank. The TVP testing shall be conducted at the actual storage temperature of the produced fluid in the gauge tank using the applicable TVP test method specified in Section 6.4 of Rule 4623 (Storage of Organic Liquids). The operator shall submit the TVP testing results to the APCO as specified in Section 6.1.9 of Rule 4401. [District Rule 4401, 6.2.3] Federally Enforceable Through Title V Permit
40. 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
41. 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

CONDITIONS CONTINUE ON NEXT PAGE

42. 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
43. 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
44. The operator shall maintain an inspection log in which the operator records at least all of the following for each inspection performed: 1) The total number of components inspected, and the total number and percentage of leaking components found by component type, 2) The location, type and name or description of each leaking component and description of any unit where the leaking component is found, 3) The date of leak detection and the method of leak detection, 4) For gaseous leaks, the leak concentration in ppmv and, for liquids leaks, whether the leak is major or minor, 5) The date of repair, replacement or removal from operation of leaking components, 6) The identity and location of essential components and critical components as defined in this Rule, found leaking, that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier, 7) The methods used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than 1 year after detection, whichever comes earlier, 8) The date or re-inspection and the leak concentration in ppmv after the component is repaired or replaced, 9) The inspectors name, business mailing address, and business telephone number, and 10) The date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401, 6.4] Federally Enforceable Through Title V Permit
45. The operator shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures as necessary. [District Rule 4401, 6.5] Federally Enforceable Through Title V Permit
46. 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
47. All records of required monitoring data and support information shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rules 2520, 9.4.2 and 4401, 6.1] Federally Enforceable Through Title V Permit
48. The crude oil production wells associated with this unit do not have production enhanced by in-situ combustion. Therefore, the requirements of SJVUAPCD Rule 4407 (Adopted May 19, 1994) do not apply to this permit unit. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1246-294-11

ISSUANCE DATE: 09/25/2012

LEGAL OWNER OR OPERATOR: BERRY PETROLEUM COMPANY
MAILING ADDRESS: 5201 TRUXTUN AVENUE SUITE 100
ATTN: EH&S MANAGER
BAKERSFIELD, CA 93309-0422

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
KERN COUNTY, CA

SECTION: NW18 **TOWNSHIP:** 28S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 85 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR (MNJ-405) WITH NORTH AMERICAN 4231-85-GLE ULTRA LOW NOX BURNER (SERIAL # 2097309), FGR, AND O2 CONTROLLER (GEN SITE 1824); AUTHORIZE COMBUSTION OF TEOR GAS FROM S-1247-296 AND INCREASE SULFUR LIMIT FROM 1.0 GR S/100 SCF TO 2.1 GR S/100 SCF

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Unit is approved for operation at the following locations: NW Section 18, T28S, R21E; NE and SE Section 3, T31S, R22E; NE, SE, and SW Section 2, T31S, R22E; Section 11, T31S, 22E; & SE Sections 24, T31S, R22E. [District Rule 4102]
4. Permittee shall notify the District Compliance Division of each location at which the unit is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 1070] Federally Enforceable Through Title V Permit
5. The duration of each startup and shutdown period shall not exceed 2.0 hours. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

S-1246-294-11; Jul 2 2013 2:11PM -- EDGEHLR : Joint Inspection NOT Required

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6. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
7. This unit shall be fired on natural gas, ethane rich gas, and/or TEOR gas treated to remove 95% by weight of sulfur compounds or treated such that the sulfur content does not exceed 1 gr of sulfur compounds (as S) per 100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The higher heating value of each non-certified fuel shall be certified by a third party fuel supplier or determined by ASTM D1826 or D1945 in conjunction with ASTM D 3588. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
9. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
10. The maximum fuel content shall not exceed 2.1 gr S/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Except for periods of startup and shutdown, emissions from the natural gas-fired unit shall not exceed any of the following limits: 7 ppmvd NO_x @ 3% O₂ or 0.008 lb-NO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 50 ppmvd CO @ 3% O₂ or 0.037 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
12. Maximum NO_x emissions from the steam generator, including start-up and shutdown, shall not exceed 19.7 lb-NO_x/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
14. At least quarterly, the permittee shall monitor using the methods specified in this permit the higher heating value of each non-certified fuel supplied to this unit, or, alternatively, have the higher heating value certified by the fuel supplier. The records of higher heating value and quantity of fuel combusted shall be used to demonstrate that the rated heat input capacity of this unit, as averaged over a calendar quarter, is not exceeded. [District Rules 2201] Federally Enforceable Through Title V Permit
15. Permittee shall determine sulfur content of combusted gas weekly for eight consecutive weeks. After demonstrating compliance for eight consecutive weeks testing may be conducted on a quarterly basis. Weekly sulfur testing shall resume if quarterly testing does not indicate compliance. Weekly gas analysis shall be performed using Draeger tubes and quarterly analysis using ASTM method D3246 or double GC for H₂S and mercaptans. First of the weekly gas analyses shall be done using laboratory analysis. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
16. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
17. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

18. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
22. Source testing to measure NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
23. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
25. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
26. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
29. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

30. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
31. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (12/17/92); 4601, sections 5.1, 5.2, 5.4, 5.5, 6.1, and 6.2 (10/31/01); 8021 (11/15/01); 8031 (11/15/01); 8061 (11/15/01); A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
32. Daily records of start-up and shutdown durations and number of occurrences of each shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
33. Permittee shall maintain monthly records of all fuel sources combusted in this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
34. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
35. Prior to operating equipment under this Authority to Construct, permittee shall surrender emission reduction credits for the following quantities of emissions: SO_x: 880 lb/quarter. Offsets include the applicable offset ratio specified in Section 4.8 of Rule 2201 (as amended 4/21/11). [District Rule 2201] Federally Enforceable Through Title V Permit
36. ERC Certificate Number S-3883-5 (or certificate split from this certificates) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1246-296-29

ISSUANCE DATE: 09/25/2012

LEGAL OWNER OR OPERATOR: BERRY PETROLEUM COMPANY
MAILING ADDRESS: 5201 TRUXTUN AVENUE SUITE 100
ATTN: EH&S MANAGER
BAKERSFIELD, CA 93309-0422

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
KERN COUNTY, CA

SECTION: 02 TOWNSHIP: 31S RANGE: 22E

EQUIPMENT DESCRIPTION:

MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY (TEOR) OPERATION SERVING 155 WELLS INCLUDING GAS/LIQUID SEPARATORS, HEAT EXCHANGERS, COMPRESSORS, INLET SEPARATOR VESSELS, CONDENSATE PUMPS, SULFUR SCRUBBER, AND VAPOR PIPING TO STEAM GENERATORS S-1246-3, -24, AND -46 AND/OR DOGGR APPROVED GAS DISPOSAL WELLS (PAN FEE): LIST STEAM GENERATOR S-1246-294 AS ADDITIONAL COMBUSTION DEVICE

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Authority to Construct (ATC) S-1246-296-27 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. TEOR operation is authorized to operate at the following locations: Sections 1, 2, 3, 11, and 12 T31S, R22E. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Well vent vapor from this TEOR operation shall only be incinerated in approved steam generators or disposed of in DOGGR approved gas 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

DAVID WARNER, Director of Permit Services
S-1246-296-29: Jul 2 2013 2:11PM -- EDGEHILR : Joint Inspection NOT Required

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6. Well vent vapor from this TEOR operation shall not be incinerated in approved steam generators unless it is first scrubbed in a fuel gas sulfur scrubber and sulfur compounds are reduced by a minimum of 95%. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Compliance with scrubber sulfur removal 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 D3246 or double GC for H₂S 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 NSR Rule] Federally Enforceable Through Title V Permit
8. Well vent vapor collection and control system includes piping from sulfur scrubbers to District approved incinerating devices. Well vent vapor collection and control system includes bypass piping around sulfur scrubbers to DOGGR-approved vapor disposal well(s). [District NSR Rule] Federally Enforceable Through Title V Permit
9. Fugitive VOC emissions rate for the TEOR operation, 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/light liquid service, shall not exceed 345.6 lb-VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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
11. The annual inspection requirements of Section 5.8.1 through Section 5.8.5 of Rule 4401 shall not apply to components exclusively handling gas/vapor or liquid with a VOC content of ten percent by weight (10 wt %) or less, as determined by the test methods in Section 6.3.5 of Rule 4401. [District Rule 4401 4.9] Federally Enforceable Through Title V Permit
12. 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, 5.5.1 and 5.5.2] Federally Enforceable Through Title V Permit
13. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.8 of Rule 4401 demonstrates the existence of a component with a major liquid leak, a component with a gas leak greater than 50,000 ppmv, or 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 5.6.2.1 of Rule 4401 requiring process fluid flow through the open-ended lines. [District Rule 4401 5.6.2] Federally Enforceable Through Title V Permit
14. 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
15. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.8 of Rule 4401 demonstrates the existence of any combination of components with minor liquid leaks, minor gas leaks, or gas leaks greater than 10,000 ppmv up to 50,000 ppmv that totals more than number of leaks allowed by Table 3 of Rule 4401. [District Rule 4401 5.6.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

16. 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 5.6.2 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 5.9 of Rule 4401. [District Rule 4401 5.7.1] Federally Enforceable Through Title V Permit
17. 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 5.7.2] Federally Enforceable Through Title V Permit
18. An operator shall comply with the requirements of Section 6.7 of Rule 4401 if there is any change in the description of major components or critical components. [District Rule 4401 5.7.3] Federally Enforceable Through Title V Permit
19. 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 5.8.1] Federally Enforceable Through Title V Permit
20. 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 4 of Rule 4401. [District Rule 4401 5.8.2] Federally Enforceable Through Title V Permit
21. In addition to the inspections required by Section 5.8.1 of Rule 4401, an operator shall inspect for leaks all accessible operating pumps, compressors, and PRDs in service as follows: 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. 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 Rule 4401. [District Rule 4401 5.8.3] Federally Enforceable Through Title V Permit
22. In addition to the inspections required by Sections 5.8.1, 5.8.2 and 5.8.3 of Rule 4401, operator shall perform the following: 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, re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection, inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. Except for PRDs subject to the requirements of Section 5.8.4.1 of Rule 4401, 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 5.8.4] Federally Enforceable Through Title V Permit
23. An operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401 5.8.5] Federally Enforceable Through Title V Permit
24. 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 5.8.6] Federally Enforceable Through Title V Permit
25. An operator shall affix a readily visible weatherproof tag to a leaking component upon detection of the leak and shall include the following information on the tag: date and time of leak detection, date and time of leak measurement, for a gaseous leak, the leak concentration in ppmv, for a liquid leak, whether it is a major liquid leak or a minor liquid leak, whether the component is an essential component, an unsafe-to monitor component, or a critical component. [District Rule 4401 5.9.1] Federally Enforceable Through Title V Permit
26. An operator shall keep the tag affixed to the component until an operator has met all of the following conditions: repaired or replaced the leaking component, re-inspected the component using the test method in Section 6.3.3, and 5.9.2.3 of Rule 4401, or the component is found to be in compliance with the requirements of this rule. [District Rule 4401 5.9.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

27. 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 5.9.3] Federally Enforceable Through Title V Permit
28. Except for leaking critical components or leaking essential components subject to the requirements of Section 5.9.7 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 4 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 4401 5.9.4] Federally Enforceable Through Title V Permit
29. The repair period in calendar days shall not exceed 14 days for minor gas leaks, 5 days for major gas leaks less than or equal to 50,000 ppmv, 2 days for gas leak greater than 50,000 ppmv, 3 days for minor liquid leaks, 2 days for major liquid leaks. [District Rule 4401 5.9.4] Federally Enforceable Through Title V Permit
30. 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 4 of Rule 4401. [District Rule 4401 5.9.5] Federally Enforceable Through Title V Permit
31. The time of the initial leak detection shall be the start of the repair period specified in Table 4 of Rule 4401. [District Rule 4401 5.9.6] Federally Enforceable Through Title V Permit
32. 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 5.9.7] Federally Enforceable Through Title V Permit
33. 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
34. An operator of any steam-enhanced crude oil production well shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401 6.1.3] Federally Enforceable Through Title V Permit
35. 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 6.1.5] Federally Enforceable Through Title V Permit
36. 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 6.1.6] Federally Enforceable Through Title V Permit
37. 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 6.1.7] Federally Enforceable Through Title V Permit
38. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401 6.1.8] Federally Enforceable Through Title V Permit
39. 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 6.1.11] Federally Enforceable Through Title V Permit
40. An operator shall source test annually all vapor collection and control systems used to control emissions from steam-enhanced crude oil production well vents to determine the control efficiency of the device(s) used for destruction or removal of VOC. Compliance testing shall be performed annually by source testers certified by ARB. Testing shall be performed during June, July, August, or September of each year if the system's control efficiency is dependent upon ambient air temperature. [District Rule 4401 6.2.1] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

41. If approved by EPA, ARB, and the APCO, an operator need not comply with the annual testing requirement of Section 6.2.1 if all uncondensed VOC emissions collected by a vapor collection and control system are incinerated in fuel burning equipment, an internal combustion engine or in a smokeless flare. [District Rule 4401 6.2.2] Federally Enforceable Through Title V Permit
42. If approved by EPA, ARB, and the APCO, an operator need not comply with the annual testing requirement of Section 6.2.1 for a vapor control system which does not have a VOC destruction device. [District Rule 4401 6.2.3] Federally Enforceable Through Title V Permit
43. An operator seeking approval pursuant to Section 6.2.2 or Section 6.2.3 shall submit a written request and supporting information to the APCO. [District Rule 4401 6.2.4] Federally Enforceable Through Title V Permit
44. An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.17 of Rule 4401: Conduct an initial TVP testing of the produced fluid in each gauge tank not later than June 14, 2007. Thereafter, an operator shall conduct periodic TVP testing of each gauge tank at least once every 24 months during summer (July - September), and whenever there is a change in the source or type of produced fluid in the gauge tank. The TVP testing shall be conducted at the actual storage temperature of the produced fluid in the gauge tank using the applicable TVP test method specified in Section 6.4 of Rule 4623 (Storage of Organic Liquids). The operator shall submit the TVP testing results to the APCO as specified in Section 6.1.10 of Rule 4401. [District Rule 4401 6.2.5] Federally Enforceable Through Title V Permit
45. 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
46. 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
47. 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
48. 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 6.3.5] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

49. 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
50. All records of required monitoring data and support information shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rules 2520, 9.4.2 and 4401, 6.1] Federally Enforceable Through Title V Permit
51. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
52. Collected vapors shall be disposed of in District approved incineration devices, as listed on this permit, or in Department of Oil, Gas and Geothermal Resources (DOGGR) approved vapor disposal wells. Permittee shall make documentation of DOGGR approval for injection wells readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
53. The operator shall maintain records of the fugitive component count and calculated VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
54. 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 NSR Rule] Federally Enforceable Through Title V Permit
55. 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
56. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1246-353-1

ISSUANCE DATE: 10/09/2012

LEGAL OWNER OR OPERATOR: BERRY PETROLEUM COMPANY
MAILING ADDRESS: 5201 TRUXTUN AVENUE SUITE 100
ATTN: EH&S MANAGER
BAKERSFIELD, CA 93309-0422

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
KERN COUNTY, CA

SECTION: SW 2 **TOWNSHIP:** 31S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 85 MMBTU/HR NATURAL/ETHANE-RICH NATURAL/TEOR/TVR GAS-FIRED STEAM GENERATOR (MNJ-427) WITH A NORTH AMERICAN MAGNA FLAME LE ULTRA LOW NOX BURNER (OR EQUIVALENT), FLUE GAS RECIRCULATION (FGR) AND AN O2 CONTROLLER: AUTHORIZE ADDITIONAL LOCATION OF OPERATION AT SE SECTION 2, T31S, R22E

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. 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]
3. 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]

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

S-1246-353-1; Jul 2 2013 2:11PM -- EDGEHILR : Joint Inspection NOT Required

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

4. 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]
5. 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]
6. 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]
7. Any wells discovered or exposed during construction activities will be tested for flammable vapors. [Public Resources Code 21000-21177: California Environmental Quality Act]
8. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
9. This unit shall be equipped with horizontal convection section with at least 235 square feet of bare tube surface area (or thermodynamically equivalent number of square feet of finned tube) per MMBtu/hr of heat input. [Public Resources Code 21000-21177: California Environmental Quality Act]
10. This unit shall be equipped with variable frequency drive high efficiency electrical motors driving the blower and water pump. [Public Resources Code 21000-21177: California Environmental Quality Act]
11. Unit is approved for operation only at NW Section 21, T30S, R22E and SE Section 2, T31S, R22E. [District Rule 4102]
12. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
13. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
14. This unit shall be fired on natural gas, TEOR gas, and/or TVR gas treated to remove 95% by weight of sulfur compounds or treated such that the sulfur content does not exceed 1 gr of sulfur compounds (as S) per 100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The maximum fuel sulfur content shall not exceed 1.75 gr S/100scf. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The higher heating value of each non-certified fuel shall be certified by a third party fuel supplier or determined by ASTM D1826 or D1945 in conjunction with ASTM D 3588. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
17. Except for periods of startup and shutdown, emissions from the natural gas-fired unit shall not exceed any of the following limits: 7 ppmvd NO_x @ 3% O₂ or 0.0085 lb-NO_x/MMBtu, 0.005 lb-PM₁₀/MMBtu, 35 ppmvd CO @ 3% O₂ or 0.026 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4201, 4301, 4305, 4306, 4320, and 4801] Federally Enforceable Through Title V Permit
18. Maximum NO_x emissions from the steam generator, including start-up and shutdown, shall not exceed 19.7 lb-NO_x/day. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
21. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted within 60 days of initial startup and at least once every twelve (12) months thereafter. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
22. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
23. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
24. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
25. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
26. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
27. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
28. Fuel sulfur content shall be determined using EPA Method 11 or Method 15. [District Rule 4320] Federally Enforceable Through Title V Permit
29. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
30. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
31. At least quarterly, the permittee shall monitor using the methods specified in this permit the higher heating value of each non-certified fuel supplied to this unit, or, alternatively, have the higher heating value certified by the fuel supplier. The records of higher heating value and quantity of fuel combusted shall be used to demonstrate that the rated heat input capacity of this unit, as averaged over a calendar quarter, is not exceeded. [District Rules 2201] Federally Enforceable Through Title V Permit

32. Permittee shall determine sulfur content of combusted gas weekly for eight consecutive weeks. After demonstrating compliance for eight consecutive weeks testing may be conducted on a quarterly basis. Weekly sulfur testing shall resume if quarterly testing does not indicate compliance. Weekly gas analysis shall be performed using Draeger tubes and quarterly analysis using ASTM method D3246 or double GC for H₂S and mercaptans. First of the weekly gas analyses shall be done using laboratory analysis. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
33. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
34. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
35. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
36. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
37. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
38. Permittee shall maintain monthly records of gas combusted in this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
39. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
40. ATC shall be implemented concurrently with or subsequent to ATC S-1246-353-0. [District Rule 2201] Federally Enforceable Through Title V Permit

ATTACHMENT C

Permit Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

RECEIVED
OCT -1 2012
SJVAPCD
Southern Region

Permit Application For:

[] ADMINISTRATIVE AMENDMENT [X] MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Berry Petroleum Company (BPC)	
2. MAILING ADDRESS: STREET/P.O. BOX: 5201 Truxtun Ave., Suite 100	
CITY: Bakersfield	STATE: CA 9-DIGIT ZIP CODE: 93309
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: Various location in HOW CITY: _____ _____ 1/4 SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: _____
4. GENERAL NATURE OF BUSINESS: Oil and gas production	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Implement five Authorities to Construct for two TEOR operations and two steam generators S '-294-11, '-296-29, '-353-0, and '-353-1. (MM) (MM) (MM) 5-1246-179-12, (-179-16) MM RUE 10-31-12 (see 10-31-12 email)	
6. TYPE OR PRINT NAME OF APPLICANT: John Ludwick	TITLE OF APPLICANT: Regulatory Compliance Specialist
7. SIGNATURE OF APPLICANT: <i>John Ludwick</i>	DATE: 10/1/2012 PHONE: (661) 616-3807 FAX: (661) 616-3892 EMAIL: jjl@bry.com

For APCD Use Only:

No \$

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: S-1123658 FACILITY ID: S-1246

EDGE HILL

TV MM

San Joaquin Valley Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

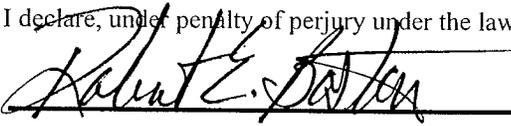
- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: Berry Petroleum Company (BPC)	FACILITY ID: S-1246
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: Berry Petroleum Company (BPC)	
3. Agent to the Owner: Tim Crawford	

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

10/1/2012

Date

Robert Boston

Name of Responsible Official (please print)

Manager of EHS

Title of Responsible Official (please print)

ATTACHMENT D

Previous Title V PTOs

S-1246-179-10, '-294-10, and '-296-21

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1246-179-10

EXPIRATION DATE: 03/31/2016

SECTION: 21 **TOWNSHIP:** 30S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

THERMALLY ENHANCED OIL RECOVERY OPERATION WELL VENT VAPOR CONTROL SYSTEM SERVING 200 STEAM ENHANCED WELLS

PERMIT UNIT REQUIREMENTS

1. All uncondensed VOC emissions collected by vapor collection and control system shall be incinerated in District approved steam generators S-1246-46 or S-1246-292. [District Rules 2201 and 4401, 5.1 and 5.2] Federally Enforceable Through Title V Permit
2. Permittee shall maintain an accurate component count and resulting emissions calculations in accordance with CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Ranges emission factors. Permittee shall update such records when new components are installed. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Fugitive emissions from all components in gas service associated with this TEOR operation shall not exceed 84.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the requirements of District Rule 4401. [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
5. The uncontrolled VOC emissions from any well vent shall be reduced by at least 99 percent by weight or, if several steam-enhanced crude oil production well vents are connected to a vapor collection and control system, total uncontrolled VOC emissions shall be reduced by at least 99 percent. [District Rule 4401, 5.1 and 5.2] Federally Enforceable Through Title V Permit
6. An operator shall not operate a steam-enhanced crude oil production well unless either of the following two conditions are met: 1) The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids is connected to a VOC collection and control system as defined in Section 3.0 of this Rule or 2) the steam-enhanced crude oil production well vent is open and the well vent is connected to a VOC collection and control system as defined in Section 3.0. [District Rule 4401, 5.5.1 and 5.5.2] Federally Enforceable Through Title V Permit
7. There shall be no open-ended line or a valve located at the end of the line that is not sealed with a blind flange, plug, cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended lines. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401, 5.6.2.1] Federally Enforceable Through Title V Permit
8. There shall be no components with a major liquid leak as defined in Section 3.20.2 of Rule 4401. [District Rule 4401, 5.6.2.2] Federally Enforceable Through Title V Permit
9. There shall be no components with a gas leak of greater than 50,000 ppmv. [District Rule 4401, 5.6.2.3] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.8 of Rule 4401 demonstrates the existence of any combination of components with minor liquid leaks, minor gas leaks, or gas leaks greater than 10,000 ppmv up to 50,000 ppmv that totals more than number of leaks allowed by Table 3 of Rule 4401. [District Rule 4401, 5.6.2.4] Federally Enforceable Through Title V Permit
11. No leaking components (as defined in Section 5.6.2 of Rule 4401) may be used unless they have been identified with a tag for repair, are repaired, or awaiting re-inspection after being repaired within the applicable time frame specified in Section 5.9. [District Rule 4401, 5.7.1] Federally Enforceable Through Title V Permit
12. Each hatch shall be closed at all times except during attended repair, replacement, or maintenance operations, providing such activities are done as expeditiously as possible with minimal spillage or material and VOC emissions into the atmosphere. [District Rule 4401, 5.7.2] Federally Enforceable Through Title V Permit
13. The operator shall comply with the requirements of Section 6.7 if there is any change in the description of major components or critical components. [District Rule 5.7.3] Federally Enforceable Through Title V Permit
14. Unless otherwise specified in Section 5.8, an operator shall perform all component inspections and gas leak measurements pursuant to the requirements of Section 6.3.3. [District Rule 4401, 5.8] Federally Enforceable Through Title V Permit
15. Except for pipes and unsafe-to-monitor components, an operator shall inspect all other components pursuant to the requirements of Section 6.3.3 at least once every year. [District Rule 4401, 5.8.1] Federally Enforceable Through Title V Permit
16. 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 4 of this Rule. [District Rule 4401, 5.8.2] Federally Enforceable Through Title V Permit
17. 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, 5.8.3] Federally Enforceable Through Title V Permit
18. 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, 5.8.4] Federally Enforceable Through Title V Permit
19. Components located in unsafe areas shall be inspected and repaired at the next process unit turnaround and inaccessible components shall be inspected at least annually. [District Rule 4401, 5.8.5] Federally Enforceable Through Title V Permit
20. A District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. [District Rule 5.8.6] 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.

21. 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 5.9.1] Federally Enforceable Through Title V Permit
22. 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, 5.9.2] Federally Enforceable Through Title V Permit
23. 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, 5.9.3] Federally Enforceable Through Title V Permit
24. Except for leaking critical components or leaking essential components subject to the requirements of Section 5.9.7, if an operator has minimized a leak but the leak still exceeds the applicable leak limits as defined in Section 3.0, an operator shall comply with at least one of the following three requirements as soon as practicable but not later than the time period specified in Table 4: 1) Repair or replace the leaking component, 2) Vent the leaking component to a VOC collection and control system as defined in Section 3.0, or 3) Remove the leaking component from operation. [District Rule 4401, 5.9.4] Federally Enforceable Through Title V Permit
25. The repair period in calendar days shall not exceed 14 days for minor gas leaks, 5 days for major gas leaks less than or equal to 50,000 ppmv, 2 days for gas leak greater than 50,000 ppmv, 3 days for minor liquid leaks, 2 days for major liquid leaks. [District Rule 4401, 5.9.4] Federally Enforceable Through Title V Permit
26. 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 4. [District Rule 4401, 5.9.5] Federally Enforceable Through Title V Permit
27. The time of the initial leak detection shall be the start of the repair period specified in Table 4. [District Rule 4401, 5.9.6] Federally Enforceable Through Title V Permit
28. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401, 5.9.7] Federally Enforceable Through Title V Permit
29. 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
30. An operator of any steam-enhanced crude oil production well shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401, 6.1.3] Federally Enforceable Through Title V Permit
31. The operator of any steam-enhanced crude oil production well shall maintain an inspection log pursuant to Section 6.4 of Rule 4401. [District Rule 4401, 6.1.5] Federally Enforceable Through Title V Permit
32. Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, instrument reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration [District Rule 4401, 6.1.6] Federally Enforceable Through Title V Permit
33. 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, 6.1.7] Federally Enforceable Through Title V Permit
34. An operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401, 6.1.8] 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.

35. 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, 6.1.11] Federally Enforceable Through Title V Permit
36. An operator shall source test annually all vapor collection and control systems used to control emissions from steam-enhanced crude oil production well vents to determine the control efficiency of the device(s) used for destruction or removal of VOC. Compliance testing shall be performed annually by source testers certified by ARB. Testing shall be performed during June, July, August, or September of each year if the system's control efficiency is dependent upon ambient air temperature. [District Rule 44011, 6.2.1] Federally Enforceable Through Title V Permit
37. If approved by EPA, ARB, and the APCO, an operator need not comply with the annual testing requirement of Section 6.2.1 if all uncondensed VOC emissions collected by a vapor collection and control system are incinerated in fuel burning equipment, an internal combustion engine or in a smokeless flare. [District Rule 4401, 6.2.2] Federally Enforceable Through Title V Permit
38. If approved by EPA, ARB, and the APCO, an operator need not comply with the annual testing requirement of Section 6.2.1 for a vapor control system which does not have a VOC destruction device. [District Rule 4401, 6.2.3] Federally Enforceable Through Title V Permit
39. An operator seeking approval pursuant to Section 6.2.2 or Section 6.2.3 shall submit a written request and supporting information to the APCO. The District shall evaluate the request and if approved by the APCO, the District shall provide EPA and ARB with a copy of the evaluation and shall request EPA and ARB approval. The District evaluation and the APCO request shall be deemed approved unless EPA or ARB objects to such approval in writing within 45 days of the receipt of the APCO request. [District Rule 4401, 6.2.4] Federally Enforceable Through Title V Permit
40. An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.17 of Rule 4401: Conduct an initial TVP testing of the produced fluid in each gauge tank not later than June 14, 2007. Thereafter, an operator shall conduct periodic TVP testing of each gauge tank at least once every 24 months during summer (July - September), and whenever there is a change in the source or type of produced fluid in the gauge tank. The TVP testing shall be conducted at the actual storage temperature of the produced fluid in the gauge tank using the applicable TVP test method specified in Section 6.4 of Rule 4623 (Storage of Organic Liquids). The operator shall submit the TVP testing results to the APCO as specified in Section 6.1.10 of Rule 4401. [District Rule 4401, 6.2.5] Federally Enforceable Through Title V Permit
41. 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
42. 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
43. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

44. 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, 6.3.5] Federally Enforceable Through Title V Permit
45. The operator shall maintain an inspection log in which the operator records at least all of the following for each inspection performed: 1) The total number of components inspected, and the total number and percentage of leaking components found by component type, 2) The location, type and name or description of each leaking component and description of any unit where the leaking component is found, 3) The date of leak detection and the method of leak detection, 4) For gaseous leaks, the leak concentration in ppmv and, for liquids leaks, whether the leak is major or minor, 5) The date of repair, replacement or removal from operation of leaking components, 6) The identity and location of essential components and critical components as defined in this Rule, found leaking, that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier, 7) The methods used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than 1 year after detection, whichever comes earlier, 8) The date or re-inspection and the leak concentration in ppmv after the component is repaired or replaced, 9) The inspectors name, business mailing address, and business telephone number, and 10) The date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401, 6.4] Federally Enforceable Through Title V Permit
46. The operator shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures as necessary. [District Rule 4401, 6.5] Federally Enforceable Through Title V Permit
47. 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
48. All records of required monitoring data and support information shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rules 2520, 9.4.2 and 4401, 6.1] Federally Enforceable Through Title V Permit
49. The crude oil production wells associated with this unit do not have production enhanced by in-situ combustion. Therefore, the requirements of SJVUAPCD Rule 4407 (Adopted May 19, 1994) do not apply to this permit unit. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1246-294-10

EXPIRATION DATE: 03/31/2016

SECTION: SE3 **TOWNSHIP:** 31S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

85 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR (MNJ-405) WITH NORTH AMERICAN 4231-85-GLE ULTRA LOW NOX BURNER (SERIAL # 2097309), FGR, AND O2 CONTROLLER (GEN SITE 1824)

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Unit is approved for operation at the following locations: NW Section 18, T28S, R21E; NE and SE Section 3, T31S, R22E; NE, SE, and SW Section 2, T31S, R22E; Section 11, T31S, 22E; & SE Sections 24, T31S, R22E. [District Rule 4102]
3. Permittee shall notify the District Compliance Division of each location at which the unit is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 1070] Federally Enforceable Through Title V Permit
4. The duration of each startup and shutdown period shall not exceed 2.0 hours. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
5. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
6. This steam generator may be fired on any combination of ethane-rich natural gas and PUC quality natural gas. [District Rules 2201] Federally Enforceable Through Title V Permit
7. At least quarterly, the permittee shall monitor using the methods specified in this permit the higher heating value of each non-certified fuel supplied to this unit, or, alternatively, have the higher heating value certified by the fuel supplier. The records of higher heating value and quantity of fuel combusted shall be used to demonstrate that the rated heat input capacity of this unit, as averaged over a calendar quarter, is not exceeded. [District Rules 2201] Federally Enforceable Through Title V Permit
8. The higher heating value of each non-certified fuel shall be certified by a third party fuel supplier or determined by ASTM D1826 or D1945 in conjunction with ASTM D 3588. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
9. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
10. The maximum fuel content shall not exceed 1.0 gr S/100 scf. [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.

11. Except for periods of startup and shutdown, emissions from the natural gas-fired unit shall not exceed any of the following limits: 7 ppmvd NO_x @ 3% O₂ or 0.008 lb-NO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 50 ppmvd CO @ 3% O₂ or 0.037 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
12. Maximum NO_x emissions from the steam generator, including start-up and shutdown, shall not exceed 19.7 lb-NO_x/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
14. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
17. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
18. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
19. Source testing to measure NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
20. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] 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.

21. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
22. Permittee shall determine sulfur content of combusted gas annually. [District Rule 4320] Federally Enforceable Through Title V Permit
23. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
26. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
28. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
29. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (12/17/92); 4601, sections 5.1, 5.2, 5.4, 5.5, 6.1, and 6.2 (10/31/01); 8021 (11/15/01); 8031 (11/15/01); 8061 (11/15/01); A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
30. Daily records of start-up and shutdown durations and number of occurrences of each shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
31. Permittee shall maintain monthly records of fuel combusted in this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
32. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1246-296-21

EXPIRATION DATE: 03/31/2016

SECTION: 02 **TOWNSHIP:** 31S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

THERMALLY ENHANCED OIL RECOVERY (TEOR) OPERATION WELL VENT VAPOR CONTROL SYSTEM SERVING 1050 WELLS INCLUDING GAS/LIQUID SEPARATORS, HEAT EXCHANGERS, COMPRESSORS, INLET SEPARATOR VESSELS, CONDENSATE PUMPS, SULFUR SCRUBBER, VAPOR PIPING FROM TANKS '337 AND '339 AND VAPOR PIPING TO STEAM GENERATORS S-1246-3, '-24, '-46, '-119, '-292, '-293, '-342, '-343, '-344, '-345, '-346, '-355, '-356, '-357, '-358, '-359 AND/OR DOGGR APPROVED GAS DISPOSAL WELLS (NMWSS)

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. TEOR operation is authorized to operate at the following locations: Sections 1, 2, 3, 11, and 12 T31S, R22E. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Well vent vapor from this TEOR operation shall only be incinerated in approved steam generators or disposed of in DOGGR approved gas disposal wells. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Well vent vapor from this TEOR operation shall not be incinerated in approved steam generators unless it is first scrubbed in a fuel gas sulfur scrubber and sulfur compounds are reduced by a minimum of 95%. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Compliance with scrubber sulfur removal 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 D3246 or double GC for H₂S 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. Well vent vapor collection and control system includes piping from sulfur scrubbers to District approved incinerating devices. Well vent vapor collection and control system includes bypass piping around sulfur scrubbers to DOGGR-approved vapor disposal well(s). [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive VOC emissions rate for the TEOR operation, 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/light liquid service, shall not exceed 450.9 lb-VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. 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. [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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9. The inspection requirements of Section 5.4.1 through Section 5.4.7 of Rule 4401 shall not apply to components exclusively handling gas/vapor or liquid with a VOC content of ten percent by weight (10%) or less, as determined by the test methods in Section 6.3.4 of Rule 4401. [District Rule 4401, 4.7] Federally Enforceable Through Title V Permit
10. 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
11. An operator shall not operate a steam-enhanced crude oil production well unless the operator complies with either of 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, or 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 and 5.1] Federally Enforceable Through Title V Permit
12. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of 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, a component with a major liquid leak, or a component with a gas leak greater than 50,000 ppmv. [District Rule 4401, 5.2] Federally Enforceable Through Title V Permit
13. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of any combination of components with minor liquid leaks, minor gas leaks, or a gas leaks greater than 10,000 ppmv up to 50,000 ppmv that totals more than number of leaks allowed by Table 2 of Rule 4401. [District Rule 4401, 5.2] Federally Enforceable Through Title V Permit
14. 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] Federally Enforceable Through Title V Permit
15. 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] Federally Enforceable Through Title V Permit
16. 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] Federally Enforceable Through Title V Permit
17. 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] Federally Enforceable Through Title V Permit
18. 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] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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19. In addition to the inspections required by Section 5.4.1 of Rule 4401, an operator shall inspect for leaks all accessible operating pumps, compressors, and PRDs in service as follows: 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. Any audio-visual inspection of an accessible operating pump, compressor, and PRD performed by an operator that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected not later than 24 hours after conducting the audio-visual inspection. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 3 of Rule 4401. [District Rule 4401, 5.4] Federally Enforceable Through Title V Permit
20. In addition to the inspections required by Sections 5.4.1, 5.4.2 and 5.4.3 of Rule 4401, operator shall perform the following: 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, re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection, inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. Except for PRDs subject to the requirements of Section 5.4.4.1 of Rule 4401, 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] Federally Enforceable Through Title V Permit
21. An operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401, 5.4] Federally Enforceable Through Title V Permit
22. 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] Federally Enforceable Through Title V Permit
23. An operator shall affix a readily visible weatherproof tag to a leaking component upon detection of the leak and shall include the following information on the tag: date and time of leak detection, date and time of leak measurement, for a gaseous leak, the leak concentration in ppmv, for a liquid leak, whether it is a major liquid leak or a minor liquid leak, whether the component is an essential component, an unsafe-to monitor component, or a critical component. [District Rule 4401, 5.5] Federally Enforceable Through Title V Permit
24. An operator shall keep the tag affixed to the component until an operator has met all of the following conditions: repaired or replaced the leaking component, re-inspected the component using the test method in Section 6.3.3, and the component is found to be in compliance with the requirements of this rule. [District Rule 4401 5.5] Federally Enforceable Through Title V Permit
25. 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] Federally Enforceable Through Title V Permit
26. 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 4401, 5.5] Federally Enforceable Through Title V Permit
27. The repair period in calendar days shall not exceed 14 days for minor gas leaks, 5 days for major gas leaks less than or equal to 50,000 ppmv, 2 days for gas leak greater than 50,000 ppmv, 3 days for minor liquid leaks, 2 days for major liquid leaks. [District Rule 4401, 5.5] Federally Enforceable Through Title V Permit
28. 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] Federally Enforceable Through Title V Permit
29. 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] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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30. 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] Federally Enforceable Through Title V Permit
31. 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] Federally Enforceable Through Title V Permit
32. An operator of any steam-enhanced crude oil production well shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit
33. 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] Federally Enforceable Through Title V Permit
34. 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] Federally Enforceable Through Title V Permit
35. 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] Federally Enforceable Through Title V Permit
36. 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] Federally Enforceable Through Title V Permit
37. 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] Federally Enforceable Through Title V Permit
38. 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 in Section 3.30 of Rule 4401 is not subject to compliance source testing requirements. [District Rule 4401, 6.2] Federally Enforceable Through Title V Permit
39. If approved by EPA, ARB, and the APCO, an operator need not comply with the annual testing requirement of Section 6.2.1 if all uncondensed VOC emissions collected by a vapor collection are controlled by an internal combustion engine subject to Rule 4702, a combustion device subject to Rule 4320, 4307 or 4308, a flare subject to Rule 4311. [District Rule 4401, 6.2] Federally Enforceable Through Title V Permit
40. 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] 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.

41. 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] Federally Enforceable Through Title V Permit
42. 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] Federally Enforceable Through Title V Permit
43. 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] Federally Enforceable Through Title V Permit
44. 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] Federally Enforceable Through Title V Permit
45. 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
46. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401, 6.1 and 6.5] Federally Enforceable Through Title V Permit
47. Operator shall keep a list of all gauge tanks, as defined in Section 3.0 of Rule 4401. 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 and 6.6] Federally Enforceable Through Title V Permit
48. 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
49. All records of required monitoring data and support information shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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50. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
51. Collected vapors shall be disposed of in District approved incineration devices, as listed on this permit, or in Department of Oil, Gas and Geothermal Resources (DOGGR) approved vapor disposal wells. Permittee shall make documentation of DOGGR approval for injection wells readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
52. The operator shall maintain records of the fugitive component count and calculated VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
53. 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
54. 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
55. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 1070]

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