



OCT 06 2015

Mr. Carl Dean
Bellaire Oil Company
5299 DTC Blvd, Suite 1300
Greenwood Village, CO 80111

Re: Notice of Significant Title V Permit Modification
District Facility # S-2624
Project # 1151315

Dear Mr. Dean:

Enclosed for your review is the District's analysis of an application for significant Title V permit modification for the facility identified above. Bellaire Oil Company is proposing a Title V significant permit modification to incorporate the recently issued S-2624-165-0 (under project S-1151315) into the Title V operating permit (see enclosures). The ATC authorized installation of a crude oil storage tank.

Enclosed are the current Title V permit, recently issued S-2624-165-0, proposed modified Title V permit, engineering evaluation, and application. The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the modified Title V operating permit. Please submit your comments within the 30-day public comment period, as specified in the enclosed public notice.

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

Mr. Carl Dean
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Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,



Arnaud Marjollet
Director of Permit Services

AM: dt/ya

Enclosures

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

TITLE V APPLICATION REVIEW

Significant Modification
Project #: S-1151315

Engineer: David Torii
Date: 9/29/15

Facility Number: S-2624
Facility Name: Bellaire Oil Company
Mailing Address: 5299 DTC Blvd, Suite 1300
Greenwood Village, CO 80111

Contact Name: Carl Dean
Phone: 303-771-2343

Responsible Official: Carl Dean
Title: President

I. PROPOSAL

Bellaire Oil Company (Bellaire) is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct (ATC) S-2624-165-0 into the Title V operating permit. The ATC authorized installation of a crude oil storage tank.

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 equipment is located within Bellaire's Heavy Oil Central source within the Kern Front lease.

III. EQUIPMENT DESCRIPTION

S-2624-165-0: ONE 141,250 GALLON FIXED ROOF CRUDE OIL
STORAGE TANK #T-7 KERN FRONT SECTION 27

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a significant modification because the applicant did not originally apply for a Certificate of Conformity (COC) with the original New Source Review (NSR) Authorities to Construct (ATCs). As such, this project requires public review.

V. APPLICABLE REQUIREMENTS

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

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

The permit is for a new crude oil storage tank.

VII. COMPLIANCE

District Rule 2520, Section 6.0 describes the source's ability to make changes including significant permit modification. This modification does not meet the minor permit modification criteria pursuant to Section 3.20 described as follows.

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

In accordance with Rule 2520, the application meets the procedural requirements of Section 11.3 by including;

1. The identification of the source, the name and address of the permit holder, the activities and emissions change involved in the permit action;
2. The name and address of the District, the name and telephone number of District staff to contact for additional information;

ATTACHMENT A

Proposed Modified Title V Operating Permit No.
S-2624-165-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2624-165-1

EXPIRATION DATE: 04/30/2017

EQUIPMENT DESCRIPTION:

ONE 141,250 GALLON FIXED ROOF CRUDE OIL STORAGE TANK #T-7 KERN FRONT SECTION 27

PERMIT UNIT REQUIREMENTS

1. This tank shall be equipped with a pressure-vacuum (PV) relief valve set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve's set pressure. [District Rule 2201]
2. This tank shall be in a leak-free condition. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit. [District Rule 2201]
3. Except as otherwise noted in this permit, all piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 2201]
4. The tank shall be equipped with a fixed roof with no holes or openings. [District Rule 2201]
5. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.2 psia under all storage conditions. [District Rules 2201 and 4623]
6. Crude oil throughput of this tank shall not exceed 250 bbl/day based on a monthly average. [District Rule Rules 2201]
7. VOC emission rate from the tank shall not exceed 7.1 lb/day. [District Rule 2201]
8. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rules 2201 and 4623]
9. {2911} The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623]
10. {2483} For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623]
11. {2482} The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623]
12. {2912} Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623]
13. {2913} The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. {2497} Permittee shall maintain monthly records of average daily crude oil throughput and shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623]
15. {2490} All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623]

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

DRAFT

ATTACHMENT B
Authority to Construct Permit
S-2624-165-0



AUTHORITY TO CONSTRUCT

PERMIT NO: S-2624-165-0

ISSUANCE DATE: 02/25/2015

LEGAL OWNER OR OPERATOR: BELLAIRE OIL COMPANY
MAILING ADDRESS: 5299 DTC BLVD STE 1300
GREENWOOD VILLAGE, CO 80111

LOCATION: HEAVY OIL CENTRAL

EQUIPMENT DESCRIPTION:
ONE 141,250 GALLON FIXED ROOF CRUDE OIL STORAGE TANK #T-7 KERN FRONT SECTION 27

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. Authorities to Construct (ATCs) S-2624-121-2, -122-2, -123-3, -125-2, -126-2 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201]
3. This tank shall be equipped with a pressure-vacuum (PV) relief valve set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve's set pressure. [District Rule 2201]
4. This tank shall be in a leak-free condition. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit. [District Rule 2201]
5. Except as otherwise noted in this permit, all piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 2201]
6. The tank shall be equipped with a fixed roof with no holes or openings. [District Rule 2201]
7. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.2 psia under all storage conditions. [District Rules 2201 and 4623]
8. Crude oil throughput of this tank shall not exceed 250 bbl/day based on a monthly average. [District Rule Rules 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO



Arnaud Marjollet, Director of Permit Services

S-2624-165-0 Feb 26 2015 8:54AM - GARCIAU - Joint Inspection NOT Required

9. VOC emission rate from the tank shall not exceed 7.1 lb/day. [District Rule 2201]
10. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rules 2201 and 4623]
11. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623]
12. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623]
13. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623]
14. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623]
15. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623]
16. Permittee shall maintain monthly records of average daily crude oil throughput and shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623]
17. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623]

ATTACHMENT C

Emission Increases

VOC Emissions	
Permit Unit	Annual Emission Increase
S-2624-165-1	2604 lb.

RECEIVED
MAR 09 2015

SJVAPCD
Southern Region

February 26, 2015

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

Subject: Title V Modification S-2624

Dear Mr. Scandura:

Please find enclosed a Title V Minor Modification application and a check in the amount of \$114 to incorporate six ATCs into the current Title V operating permit for the Bellaire Oil Company Heavy Oil Central stationary source (S-2624).

If you have any questions or need further information, please feel free to contact Joe Selgrath at (661) 377-0073 x12.

Sincerely,



Carl Dean
President, Bellaire Oil Company

cc: Joe Selgrath – EnviroTech Consultants, Inc.

San Joaquin Valley Air Pollution Control District
www.valleyair.org

RECEIVED
MAR 09 2015
SJVAPCD
Southern Region

Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Bellaire Oil Company	
2. MAILING ADDRESS: STREET/P.O. BOX: 5299 DTC Blvd., Suite 1300 CITY: Greenwood Village STATE: CO 9-DIGIT ZIP CODE: 80111	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: _____ CITY: _____ SE 1/4 SECTION 27 TOWNSHIP 28S RANGE 27E	INSTALLATION DATE: N/A
4. GENERAL NATURE OF BUSINESS: Crude Oil Production	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Title V Minor Modification to incorporate ATC S-2624-121-2, -122-2, -123-2, -125-2, -126-2, and -165-0 as PTOs into the current Title V operating permit for S-2624. 121-126 PROCESSOR W 1151193	
6. TYPE OR PRINT NAME OF APPLICANT: Carl Dean	TITLE OF APPLICANT:
7. SIGNATURE OF APPLICANT:  DATE: 2-26-15	PHONE: (303) 771-2343 FAX: EMAIL: carl@ranchoil.com

For APCD Use Only:

Enviro Tech Consultants Inc.

DATE STAMP	FILING FEE RECEIVED \$ 114- CHECK#: 4549
	DATE PAID: 3/9/15
	PROJECT NO: S-1151193 FACILITY ID: S-2624

1151315

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MAR 09 2015

SJVAFCD
Southern Region

San Joaquin Valley
Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: Bellaire Oil Company	FACILITY ID: S - 2624
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name:	
3. Agent to the Owner:	

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

2-26-15

Date

Carl Dean

Name of Responsible Official (please print)

President

Title of Responsible Official (please print)

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

TVFORM-008
Rev: July 2005