



MAR 09 2015

Mr. Doug Shaffer
California Resources Production Corp
9600 Ming Avenue, Suite 300
Bakersfield, CA 93311

Re: Notice of Minor Title V Permit Modification
District Facility # S-8282
Project # S-1150147

Dear Mr. Shaffer:

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 ATC S-8282-109-0 (under project S-1130153) into the Title V operating permit. The ATC involves permitting one (1) new 477 bbl Wemco oil/water separator served by the vapor control system listed on permit S-8282-30.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATC S-8282-109-0, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

Thank you for your cooperation in this matter.

Sincerely,


Arnaud Marjollet
Director of Permit Services

Enclosures

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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

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

TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1150147

Engineer: Stephen Leonard
Date: March 5, 2015

Facility Number: S-8282
Facility Name: California Resources Production Corp.
Mailing Address: 9600 Ming Ave, Suite 300
Bakersfield, CA 93311

Reviewed by AP sure AQE

MAR 05 2015

Contact Name: Wm. Douglas Shaffer
Phone: 661-869-8237

Responsible Official: Nick Goodman
Title: Operations Manager, Central Valley Operations

I. PROPOSAL

California Resources Production Corp. (CRPC) is proposing a Title V minor permit modification to incorporate Authority to Construct (ATC) document S-8282-109-0 into the Title V operating permit. The ATC involves permitting one (1) new 477 bbl Wemco oil/water separator served by the vapor control system listed on permit S-8282-30.

This Title V application was originally submitted when the subject tanks were issued ATC's and constructed as part of Vintage Production California LLC. Vintage Production facility S-8282 has since undergone a name change to California Resources Production Corporation. Ownership is the same and the new permits will be issued under the California Resources name.

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 Wemco oil/water separator is located at SE ¼ Section 36, Township 31S, Range 23E, within the California Resources Production Corporation's Light Oil Western Stationary Source.

III. EQUIPMENT DESCRIPTION

S-8282-109-1: 477 BBL WEMCO OIL/WATER SEPARATOR SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-8282-30

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

The ATC was for a new permit unit. There are no modifications to existing permit units.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

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

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

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and

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

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit Unit S-8282-109-1
- B. Authority to Construct S-8282-109-0
- C. Emissions Increases
- D. Application

ATTACHMENT A

**Proposed Modified Title V Operating Permit Unit
S-8282-109-1**

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-8282-109-1

EXPIRATION DATE: 08/31/2016

SECTION: SE36 TOWNSHIP: 31S RANGE: 23E

EQUIPMENT DESCRIPTION:

477 BBL WEMCO OIL/WATER SEPARATOR SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-8282-30

PERMIT UNIT REQUIREMENTS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. VOC fugitive emissions from the components in gas and light oil service on the tank shall not exceed 0.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Fugitive VOC emissions rate shall be, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c, Oil and Gas Production Screening Value Ranges Emission Factors (Feb 1999), from the total number of components from this tank. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Permittee shall maintain records of number and type of components installed and calculated fugitive emissions. Permittee shall update such records when new components are installed. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The tank shall be equipped with a vapor loss prevention system capable of collecting all VOC emissions and preventing their emissions to the atmosphere at an efficiency of at least 99% by weight. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Components subject to District Rule 4409 shall be identified and categorized according to District Rule 4409 component types. [District Rule 2201] Federally Enforceable Through Title V Permit
9. All records required by this permit shall be retained on-site for a minimum of five years and made available for District, ARB, and EPA inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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

ATTACHMENT B

Authority to Construct S-8282-109-0



AUTHORITY TO CONSTRUCT

PERMIT NO: S-8282-109-0

ISSUANCE DATE: 08/31/2010

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

LOCATION: LIGHT OIL WESTERN STATIONARY SOURCE
KERN COUNTY, CA

SECTION: SE36 TOWNSHIP: 31S RANGE: 23E

EQUIPMENT DESCRIPTION:
477 BBL WEMCO OIL/WATER SEPARATOR SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-8282-30
(REISSUE OF ATC S-1216-138-0)

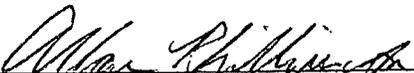
CONDITIONS

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. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. VOC fugitive emissions from the components in gas and light oil service on the tank shall not exceed 0.5 lb/day or 168 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Fugitive VOC emissions rate shall be, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c, Oil and Gas Production Screening Value Ranges Emission Factors (Feb 1999), from the total number of components from this tank. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Permittee shall maintain records of number and type of components installed and calculated fugitive emissions. Permittee shall update such records when new components are installed. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The tank shall be equipped with a vapor loss prevention system capable of collecting all VOC emissions and preventing their emissions to the atmosphere at an efficiency of at least 99% by weight. [District Rules 2201 and 4623] 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-8282-109-0; Apr 10 2013 9:41AM - LEONARDS Joint Inspection NOT Required

7. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
8. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Components subject to District Rule 4409 shall be identified and categorized according to District Rule 4409 component types. [District Rule 2201] Federally Enforceable Through Title V Permit
10. All records required by this permit shall be retained on-site for a minimum of five years and made available for District, ARB, and EPA inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

ATTACHMENT C

Emissions Increases

California Resources Production Corp.
S-8282; S1150147

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
S-8282-109-1	0	0	0	0	0

ATTACHMENT D

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

RECEIVED
JAN 22 2015

SJVAPCD
Southern Region

Permit Application For:

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

1. PERMIT TO BE ISSUED TO: California Resources Production Corporation (CRPC)		
2. MAILING ADDRESS:		
STREET/P.O. BOX: 9600 Ming Avenue, Suite 300		
CITY: Bakersfield	STATE: CA	9-DIGIT ZIP CODE: 93311
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:		INSTALLATION DATE:
STREET: 36B Waterflood Facility CITY: LOWSS		19 Jun 2012
SE ¼ SECTION 36 TOWNSHIP 31S RANGE 23E		
4. GENERAL NATURE OF BUSINESS: Crude Oil and Natural Gas Production		
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)		
Incorporate ATC S-8282-109-0 into Title V permit S-8282		
6. TYPE OR PRINT NAME OF APPLICANT: Wm. Douglas Shaffer		TITLE OF APPLICANT: HES Consultant
7. SIGNATURE OF APPLICANT: 		PHONE: (661) 869-8237
DATE: 22 Jan 2015		FAX: (661) 869-8170
		EMAIL: william_shaffer@oxy.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____ DATE PAID: _____ PROJECT NO: S-1150147 FACILITY ID: S-8282
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RECEIVED
JAN 22 2015
SJVAPCD
Southern Region

22 January 2015

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

Subject: Title V Minor Modification Application
Resubmission of Application to Implement S-8282-109-0 into the Title V
Permit

Dear Mr. Scandura:

On June 16, 2012 California Resources Elk Hills LLC submitted a Title V Minor Modification Application for the implementation of S-1216-138-0. It is my understanding that all equipment was installed and operational at that time. On January 1, 2013, this operation was transferred to California Resources Production Corporation and re-permitted as S-8282-109-0. Implemented ATC -109-0 is also associated with PTO S-8282-30; -30 already includes reference to permit -109, and both permit units have completed several annual APCD Inspections.

Attached are a copy of the original S-1216 Title V implementation application forms, and S-8282 Title V implementation forms.

Please contact the undersigned at (661) 869-8237 if you have any questions or need additional information.

Sincerely,

Wm. Douglas Shaffer, PE
HSE Environmental Consultant
California Resources Production Corporation

RECEIVED

JAN 22 2015

SJVAPCD
Southern Region

San Joaquin Valley Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION
 ADMINISTRATIVE AMENDMENT
 MINOR PERMIT MODIFICATION

COMPANY NAME: California Resources Production Corporation	FACILITY ID: S-8282
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Vintage Production California LLC	
3. Agent to the Owner: Nick Goodman	

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

22 Jan 2015

Date

Nick Goodman

Name of Responsible Official (please print)

Operations Manager, Central Valley Operations

Title of Responsible Official (please print)

Re: Title V Modification Reapplication of ATC S-8282-109-0.

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