



**NOV 18 2014**

Raymond Rodriguez  
Occidental of Elk Hills Inc  
PO Box 1001  
Tupman, CA 93276

**Re: Notice of Final Action - Minor Title V Permit Modification  
District Facility # S-382  
Project # 1131781**

Dear Mr. Rodriguez:

The Air Pollution Control Officer has modified the Title V permit for Occidental of Elk Hills Inc by incorporating Authorities to Construct (ATCs) S-382-158-15, '-840-0, '-841-0, '-842-0, '-843-0, '-844-0, and '-845-0. The ATCs authorized the addition of a hydrocyclone, three (3) 1000 gallon cone-bottom slurry settling tanks, three (3) transportable solids storage bins (roll-off type) and associated pumps and piping to the 27R Truck Washout Facility.

Enclosed is the modified Title V permit. The application and proposal were sent to US EPA Region IX on October 10, 2014. No comments were received following the District's preliminary decision on this project.

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:rue

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-382-158-17

**EXPIRATION DATE:** 10/31/2016

**SECTION:** SE27 **TOWNSHIP:** 30S **RANGE:** 23E

## **EQUIPMENT DESCRIPTION:**

39,900 GALLON FIXED ROOF DRAIN TANK T-1 WITH PV VALVE, FOUR FILTER CANISTERS (F-1/2 AND F-3/4), 40 FT. LONG BY 2 FT. WIDE WATER/OIL UNLOADING STATION, SHARED VAPOR CONTROL SYSTEM WITH S-382-312, '-597, '-830, AND '-831, HYDROCYCLONE WITH TWO HYDROCYCLONE FEED PUMPS, VENT PIPING TO EXISTING VACUUM HEADER SERVING GAS PLANTS S-2234-1, S-2234-3, AND S-2234-19

## **PERMIT UNIT REQUIREMENTS**

---

1. The tank shall be fully enclosed and shall be equipped with a closed system that collects all VOCs from the storage tank. Collected vapors shall be routed to a gas gathering system that connects to a gas processing plant. The tank and vapor recovery system shall be maintained in Leak-Free condition. [District Rule 4623, 5.6.1] Federally Enforceable Through Title V Permit
2. Permittee shall maintain with the permit accurate fugitive component counts for tank and tank vapor control system 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) for <10,000 ppmv (no leaks) from the total number of vapor and liquid components shall not exceed 0.3 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
3. VOC evaporative emissions from the water/oil unloading station shall not exceed 0.143 lb/day per square foot of surface area. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Tank pressure relief valve shall be kept closed except when tank pressure exceeds 2.3 oz. pressure under breakdown conditions. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Disposal of liquids removed by vacuum truck shall not result in an emissions increase elsewhere at this stationary source. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All vapors collected from tank vapor control system shall be processed in gas plants S-2234-1, S-2234-3 and S-2234-19. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Components associated with vapor control system shall comply with all Rule 4409 requirements listed in the facility wide permit. [District Rule 4409] Federally Enforceable Through Title V Permit
8. Operator shall monitor vapor recovery compressor activation and shut off manometer pressures on a quarterly basis to ensure that compressor activation pressure does not exceed any pressure relief valve settings. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. All tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623, 5.6.2] Federally Enforceable Through Title V Permit
11. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623, 5.6.3] 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.

12. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. A gas or liquid leak is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
13. 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
14. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
15. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rules 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
16. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
17. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
18. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified timeframes, shall constitute a violation of the District Rule 4623 (amended May 19, 2005). [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
19. If a component type for a given tank is found to leak during an annual inspection, then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, then revert to annual inspections. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
20. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623 (amended May 19, 2005), even if it is under the voluntary inspection and maintenance program. [District Rule 4623, 5.7 (Table 3)] Federally Enforceable Through Title V Permit
21. Permittee shall keep in their facility at all times a copy of the letter sent to the APCO requesting participation in the Rule 4623 Fixed Roof Tank Preventive Inspection and Maintenance Program, and Tank Interior Cleaning Program, and maintain the records of annual tank inspections, maintenance, and cleaning to document the participation in the program. [District Rule 4623, 5.7] Federally Enforceable Through Title V Permit
22. Permittee shall comply with all applicable Tank Interior Cleaning Program requirements specified in Section 5.7 of Rule 4623. [District Rule 4623, 5.7] 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.

23. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. Compliance with permit conditions in the Title V permit shall be deemed compliance with District Rule 4623 (amended May 19, 2005). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
25. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
26. This unit does not store organic materials which are liquid at standard conditions and which are used as solvers, viscosity reducers, or cleaning agents. Tank emissions are fugitive emissions not considered to come from a point source. Therefore, the requirements of District Rules 4661 (as amended September 20, 2007) and 4801 (as amended December 17, 1992) do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
27. 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
28. The operator of a fixed roof tank shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] 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-382-840-1

**EXPIRATION DATE:** 10/31/2016

**SECTION:** SE 27 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

1000 GALLON CONE-BOTTOM SETTLING TANK AND TRANSFER PUMP

## PERMIT UNIT REQUIREMENTS

---

1. Settling tank shall only operate at constant level. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Settling tank shall only store, place, or hold organic liquid with a Reid vapor pressure (RVP) of equal to or less than 5.0 psia under all storage conditions. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Permittee shall maintain with the permit accurate fugitive component counts, including the total number of vapor and liquid components, and calculated fugitive emissions 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) for <10,000 ppmv (no leaks) which shall not exceed 0.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Permittee shall conduct Reid Vapor Pressure (RVP) testing of the organic liquid stored in this tank within 60 days of initial operation and 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. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Permittee shall maintain records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
6. 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 1070] 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-382-841-1

**EXPIRATION DATE:** 10/31/2016

**SECTION:** SE27 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

1000 GALLON CONE-BOTTOM SETTLING TANK AND TRANSFER PUMP

## PERMIT UNIT REQUIREMENTS

---

1. Settling tank shall only operate at constant level. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Settling tank shall only store, place, or hold organic liquid with a Reid vapor pressure (RVP) of equal to or less than 5.0 psia under all storage conditions. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Permittee shall maintain with the permit accurate fugitive component counts, including the total number of vapor and liquid components, and calculated fugitive emissions 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) for <10,000 ppmv (no leaks) which shall not exceed 0.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Permittee shall conduct Reid Vapor Pressure (RVP) testing of the organic liquid stored in this tank within 60 days of initial operation and 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. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Permittee shall maintain records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
6. 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 1070] 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-382-842-1

**EXPIRATION DATE:** 10/31/2016

**SECTION:** SE27 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

1000 GALLON CONE-BOTTOM SETTLING TANK AND TRANSFER PUMP

## PERMIT UNIT REQUIREMENTS

---

1. Settling tank shall only operate at constant level. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Settling tank shall only store, place, or hold organic liquid with a Reid vapor pressure (RVP) of equal to or less than 5.0 psia under all storage conditions. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Permittee shall maintain with the permit accurate fugitive component counts, including the total number of vapor and liquid components, and calculated fugitive emissions 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) for <10,000 ppmv (no leaks) which shall not exceed 0.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Permittee shall conduct Reid Vapor Pressure (RVP) testing of the organic liquid stored in this tank within 60 days of initial operation and 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. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Permittee shall maintain records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
6. 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 1070] 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-382-843-1

**EXPIRATION DATE:** 10/31/2016

**SECTION:** SE27 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

SOLIDS STORAGE BIN FOR VOC CONTAINING MATERIAL

## PERMIT UNIT REQUIREMENTS

---

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. The exposed surface area of solids storage bin shall not exceed 32 square feet. [District Rule 2201] Federally Enforceable Through Title V Permit
3. VOC emissions from solids storage bin shall not exceed 0.01 lb/day per square foot of surface area. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Permittee shall maintain with the permit accurate fugitive component counts, including the total number of vapor and liquid components, and calculated fugitive emissions 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) for <10,000 ppmv (no leaks) which shall not exceed 0.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rule 2201] 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-382-844-1

**EXPIRATION DATE:** 10/31/2016

**SECTION:** SE27 **TOWNSHIP:** 30S **RANGE:** 27E

**EQUIPMENT DESCRIPTION:**

SOLIDS STORAGE BIN FOR VOC CONTAINING MATERIAL

## PERMIT UNIT REQUIREMENTS

---

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. The exposed surface area of solids storage bin shall not exceed 32 square feet. [District Rule 2201] Federally Enforceable Through Title V Permit
3. VOC emissions from solids storage bin shall not exceed 0.01 lb/day per square foot of surface area. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Permittee shall maintain with the permit accurate fugitive component counts, including the total number of vapor and liquid components, and calculated fugitive emissions 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) for <10,000 ppmv (no leaks) which shall not exceed 0.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rule 2201] 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-382-845-1

**EXPIRATION DATE:** 10/31/2016

**SECTION:** SE27 **TOWNSHIP:** 30S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

SOLIDS STORAGE BIN FOR VOC CONTAINING MATERIAL

## PERMIT UNIT REQUIREMENTS

---

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. The exposed surface area of solids storage bin shall not exceed 32 square feet. [District Rule 2201] Federally Enforceable Through Title V Permit
3. VOC emissions from solids storage bin shall not exceed 0.01 lb/day per square foot of surface area. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Permittee shall maintain with the permit accurate fugitive component counts, including the total number of vapor and liquid components, and calculated fugitive emissions 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) for <10,000 ppmv (no leaks) which shall not exceed 0.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

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