



JAN 27 2015

Joey Barulich
California Resources Production Corp.
9600 Ming Ave., Suite 300
Bakersfield, CA 93311

**Re: Notice of Final Action - Minor Title V Permit Modification
District Facility # S-1738
Project # 1140838**

Dear Mr. Barulich:

The Air Pollution Control Officer has modified the Title V permit for California Resources Production Corp. by incorporating S-1738-2-10 and '492-0. The Authority to Construct permits are for the installation of a crude oil loading rack which is served by the vapor control system listed on tank permit S-1738-2.

Enclosed is the modified Title V permit. The application and proposal were sent to US EPA Region IX on 10/20/14. 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:dbt

Enclosures

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1738-2-11

EXPIRATION DATE: 02/28/2018

SECTION: 33 **TOWNSHIP:** 12N **RANGE:** 21W

EQUIPMENT DESCRIPTION:

42,000 GALLON FIXED-ROOF PETROLEUM STORAGE TANK #TOC 1046 WITH VAPOR RECOVERY SYSTEM SHARED WITH PERMITS S-1738-30, '-31, '-53, '-226 AND '-492, INCLUDING 7.5 HP VAPOR COMPRESSOR (RIO VIEJO FIELD 86X-33)

PERMIT UNIT REQUIREMENTS

1. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6. [District Rule 4623] Federally Enforceable Through Title V Permit
2. All piping valves and fittings shall be constructed and maintained in a leak-free condition [District Rule 4623] Federally Enforceable Through Title V Permit
3. 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 ppmv, above background, as measured by a portable hydrocarbon detection instrument 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 of more than 3 drops per minute. A reading in excess of 10,000 ppmv above background or the dripping of organic liquid at a rate of more than 3 drops per minute 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
4. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit
5. 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
6. 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
7. 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
8. 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
9. Vapors shall vent only through gas line compressor. [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.

10. Storage tank p/v caps shall be set to relieve pressure at a pressure level higher than that required to actuate compressor. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Storage tank p/v caps shall be leak-free (except for in breathing) during normal operation. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Liquids from knockout vessel shall be disposed of in a manner preventing emissions to the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Vapor compressor shall activate whenever tank internal pressure exceeds 1 oz./sq. in. [District Rule 2201] Federally Enforceable Through Title V Permit
14. VOC emission rate shall not exceed 0.17 lb/hr for this permit unit and permit units S-1738-30, '-31, '-53 and '-226 combined. [District Rule 2201] Federally Enforceable Through Title V Permit
15. 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 (Table 3)] Federally Enforceable Through Title V Permit
16. 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 Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit
17. 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 (Table 3)] Federally Enforceable Through Title V Permit
18. 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 (Table 3)] Federally Enforceable Through Title V Permit
19. 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. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit
20. If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit
21. Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit
22. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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23. The control efficiency of any VOC destruction device, measured and calculated as carbon, shall be determined by US EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case US EPA Method 25a may be used. US EPA Method 18 may be used in lieu of US EPA Method 25 or US 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 the known analytes/compounds to ensure that the VOC concentrations are neither under- or over-reported. Analysis of halogenated exempt compounds shall be analyzed by ARB Method 422 "Exempt Halogenated VOCs in Gases September 12, 1990." [District Rule 4623, 6.4.6 and 6.4.7] Federally Enforceable Through Title V Permit
24. Operator shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
25. Operator shall inspect pressure relief valve for fugitive leaks annually in accordance with EPA Method 21, with the instrument calibrated with methane. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1738-492-1

EXPIRATION DATE: 02/28/2018

EQUIPMENT DESCRIPTION:

CLASS 1 ORGANIC LIQUID (CRUDE OIL) LOADING RACK WITH BOTTOM LOADING AND DRY-BREAK COUPLER, SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-1738-2

PERMIT UNIT REQUIREMENTS

1. Loading rack shall be maintained and operated in accordance with the manufacturer's specifications, and operated such that there are no leaks or excess organic liquid drainage at disconnections as defined herein. [District Rule 4624] Federally Enforceable Through Title V Permit
2. All vapors from the loading operation shall be routed to vapor control system S-1738-2. [District Rule 4624] Federally Enforceable Through Title V Permit
3. Total number of disconnects shall not exceed 10 per day or 3650 per year. [District Rule 2201] Federally Enforceable Through Title V Permit
4. During hose disconnects the maximum liquid spillage for liquids shall not exceed 10 milliliters/disconnect based on an average from 3 consecutive disconnects. [District Rule 2201 and 4624] Federally Enforceable Through Title V Permit
5. Emissions from hose disconnects shall not exceed 0.20 lb-VOC/day. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
6. Emissions from gas and light liquid components shall not exceed 0.24 lb-VOC/day. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
7. Permittee shall maintain accurate component count and emissions calculated using from the "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. [District Rule 2201] Federally Enforceable Through Title V Permit
8. For this Class 1 organic liquid transfer operation, the emission of VOC from the transfer operation shall not exceed 0.08 pounds per 1,000 gallons of organic liquid transferred. [District Rule 4624] Federally Enforceable Through Title V Permit
9. The organic liquid loading operation shall be conducted via bottom loading. [District Rule 4624] Federally Enforceable Through Title V Permit
10. A leak is defined as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute; or for organic liquids other than gasoline, the detection of any gaseous or vapor emissions with a concentration of VOC greater than 1,000 ppmv above a background as methane when measured in accordance with the test method in Section 6.3.8 of Rule 4624 or alternative method approved in writing by the APCO and EPA. Any liquid or gas coming from a component undergoing repair or replacement, or during sampling of process fluid from equipment into a container is not considered a leak provided such activities are accomplished as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4624] Federally Enforceable Through Title V Permit
11. Permittee shall inspect the loading rack for leaks during transfer at least once every calendar quarter using the test method prescribed in Section 6.3.8 of Rule 4624 or alternative method approved in writing by the APCO and EPA. [District Rule 4624] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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12. An operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually provided no leaks were found during the inspections required under provisions of Sections 5.9.1 and 5.9.2 of Rule 4624 during five consecutive quarterly inspections. Upon identification of any leak during an annual inspection the frequency shall revert back to quarterly and the operator shall contact the APCO in writing within 14 days. [District Rule 4624] Federally Enforceable Through Title V Permit
13. Corrective steps shall be taken at any time the operator observes a leak or excess drainage at disconnect. All equipment found leaking shall be repaired or replaced within 72 hours. If the leaking component cannot be repaired or replaced within 72 hours, the component shall be taken out of service until such time the component is repaired or replaced. The repaired or replaced equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624] Federally Enforceable Through Title V Permit
14. All inspections shall be documented with an inspection log. Inspection records shall include, at a minimum, 1) date of inspection, 2) location and description of any missing, loose, leaking, or damaged equipment and any malfunction requiring repair, 3) corrective steps taken to repair or replace the equipment, 4) test method and results for leak and drainage inspections, 5) location and description of any equipment to be inspected upon commencing operation after repair or replacement and 6) inspector name and signature. [District Rule 4624] Federally Enforceable Through Title V Permit
15. Permittee shall keep records of daily loading rack throughput and the results of any required leak inspections. [District Rule 4624] Federally Enforceable Through Title V Permit
16. Permittee shall comply with applicable monitoring, inspection, maintenance, and recordkeeping, and reporting requirements of Rule 4409. [District Rule 4409] Federally Enforceable Through Title V Permit
17. Permittee shall keep records of daily number of truck loading disconnects. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
18. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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