



**Santa Barbara County  
Air Pollution Control District**

AUG 31 2007

Certified Mail 7001 2510 0003 2205 0817  
Return Receipt Requested

Phil Hosch  
BreitBurn Energy Company LP  
1555 Orcutt Hill Rd  
Orcutt, CA 93455

FID: 03321  
Permit: P 12144  
SSID: 02667

Re: Final Permit to Operate and Minor Part 70 Revision 12144  
Fee Due: \$ 88

Dear Mr. Hosch:

Enclosed is the final Permit to Operate (PTO) and Minor Part 70 Revision No. 12144 for the operation of a new vapor recovery system with the compressor driven by a 3 HP motor at the Newlove Lease on the Orcutt Hill production field.

Please carefully review the enclosed documents to ensure that they accurately describe your facility and that the conditions are acceptable to you. Note that your permitted emission limits may, in the future, be used to determine emission fees.

You should become familiar with all APCD rules pertaining to your facility. This permit does not relieve you of any requirements to obtain authority or permits from other governmental agencies.

This permit requires you to:

- Pay a **fee** of \$88, which is due immediately and is considered late after 30 calendar days from the date stamped on the permit. Pursuant to APCD Rule 210.IV.B, no appeal shall be heard unless all fees have been paid. See the attached invoice for more information.
- Follow the conditions listed on your permit. Pay careful attention to the recordkeeping and reporting requirements.
- Ensure that a copy of the enclosed permit is posted or kept readily available near the permitted equipment.
- Promptly report changes in ownership, operator, or your mailing address to the APCD.

If you are not satisfied with the conditions of this permit, **you have thirty (30) days from the date of this issuance to appeal this permit to the Air Pollution Control District Hearing Board** (ref: California Health and Safety Code, §42302.1). Any contact with APCD staff to discuss the terms of this permit will not stop or alter the 30-day appeal period.

Please include the facility identification (FID) and permit numbers as shown at the top of this letter on all correspondence regarding this permit. If you have any questions, please contact Al Ronyecz at (805) 961-8877.

Sincerely,

*for*  


Peter Cantle, Manager  
Engineering & Compliance Division

enc: Final PTO 12144  
Final Permit Evaluation  
Invoice # P 12144  
Air Toxics "Hot Spots" Fact Sheet APCD Form 12B

cc: Newlove Lease 03321 Project File NC/SC  
ECD Chron File  
Accounting (Invoice only)  
R9AirPermits [SB@EPA.GOV](mailto:SB@EPA.GOV) (w/attachments)  
Marianne Strange, MF Strange & Assoc (w/ attachments)  
Craig Strommen (Cover letter only)  
Al Ronyecz (Cover letter only)



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and  
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EQUIPMENT OWNER/OPERATOR:

Breitburn Energy Company 300000

EQUIPMENT LOCATION:

Newlove Lease, Orcutt Hill Oilfield, Santa Barbara County, California

STATIONARY SOURCE/FACILITY:

Breitburn Energy Company. SSID: 02667  
Newlove Lease - Orcutt Field FID: 03321

EQUIPMENT DESCRIPTION:

This permit allows the operation of a new Newlove vapor recovery compressor powered by a 3 horsepower electric motor.

PROJECT/PROCESS DESCRIPTION:

Crude oil is produced from 56 wells on the Newlove Lease and piped to a tank battery consisting of three wash tanks, a crude storage tank, and a wastewater tank. The vapor recovery compressor serves the tank battery. A complete process description for this facility can be found in PTO 8240-R6 issued March 29, 2006.

CONDITIONS:

**9.A Standard Administrative Conditions**

The following federally-enforceable administrative permit conditions apply to the Newlove Lease:

**A.1 Compliance with Permit Conditions**

- (a) The permittee shall comply with all permit conditions in Sections 9.A, 9.B and 9.C.
- (b) This permit does not convey property rights or exclusive privilege of any sort.

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- (c) Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.
- (d) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (e) A pending permit action or notification of anticipated noncompliance does not stay any permit condition.
- (f) Within a reasonable time period, the permittee shall furnish any information requested by the Control Officer, in writing, for the purpose of determining:
  - (i) compliance with the permit, or
  - (ii) whether or not cause exists to modify, revoke and reissue, or terminate a permit or for an enforcement action. [*Re: 40 CFR Part 70.6, APCD Rules 1303.D.1*]
- (g) In the event that any condition herein is determined to be in conflict with any other condition contained herein, then, if principles of law do not provide to the contrary, the condition most protective of air quality and public health and safety shall prevail to the extent feasible.

A.2 **Emergency Provisions.** The permittee shall comply with the requirements of the APCD, Rule 505 (Upset/Breakdown rule) and/or APCD Rule 1303.F, whichever is applicable to the emergency situation. In order to maintain an affirmative defense under Rule 1303.F, the permittee shall provide the APCD, in writing, a “notice of emergency” within 2 days of the emergency. The “notice of emergency” shall contain the information/documentation listed in Sections (1) through (5) of Rule 1303.F. [*Re: 40 CFR 70.6, APCD Rule 1303.F*]

A.3 **Compliance Plan.**

- (a) The permittee shall comply with all federally-enforceable requirements that become applicable during the permit term, in a timely manner, as identified in the Compliance Plan.
- (b) For all applicable equipment, the permittee shall implement and comply with any specific compliance plan required under any federally-enforceable rules or standards. [*Re: APCD Rule 1302.D.2*]

A.4 **Right of Entry.** The Regional Administrator of USEPA, the Control Officer, or their authorized representatives, upon the presentation of credentials, shall be permitted to enter upon the premises where a Part 70 Source is located or where records must be kept:

- (a) To inspect the stationary source, including monitoring and control equipment, work practices, operations, and emission-related activity;

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- (b) To inspect and duplicate, at reasonable times, records required by this Permit to Operate;
- (c) To sample substances or monitor emissions from the source or assess other parameters to assure compliance with the permit or applicable requirements, at reasonable times. Monitoring of emissions can include source testing. [Re: *APCD Rule 1303.D.2*]

- A.6 **Payment of Fees.** The permittee shall reimburse the APCD for all its Part 70 permit processing and compliance expenses for the stationary source on a timely basis. Failure to reimburse on a timely basis shall be a violation of this permit and of applicable requirements and can result in forfeiture of the Part 70 permit. Operation without a Part 70 permit subjects the source to potential enforcement action by the APCD and the USEPA pursuant to section 502(a) of the Clean Air Act. [Re: *APCD Rules 1303.D.1 and 1304.D.11, 40 CFR 70.6*]
- A.7 **Prompt Reporting of Deviations:** The permittee shall submit a written report to the APCD documenting each and every deviation from the requirements of this permit or any applicable federal requirements within 7 days after discovery of the violation, but not later than 180-days after the date of occurrence. The report shall clearly document 1) the probable cause and extent of the deviation, 2) equipment involved, 3) the quantity of excess pollutant emissions, if any, and 4) actions taken to correct the deviation. The requirements of this condition shall not apply to deviations reported to APCD in accordance with Rule 505. *Breakdown Conditions*, or Rule 1303.F *Emergency Provisions*. [APCD Rule 1303.D.1, 40 CFR 70.6(a) (3)]
- A.8 **Reporting Requirements/Compliance Certification:** The permittee shall submit compliance certification reports to the USEPA and the Control Officer every six months. These reports shall be submitted on APCD forms and shall identify each applicable requirement/condition of the permit, the compliance status with each requirement/condition, the monitoring methods used to determine compliance, whether the compliance was continuous or intermittent, and include detailed information on the occurrence and correction of any deviations (excluding emergency upsets) from permit requirement. The reporting periods shall be each half of the calendar year, e.g., January through June for the first half of the year. These reports shall be submitted by September 1 and March 1, respectively, each year. Supporting monitoring data shall be submitted in accordance with the "Semi-Annual Monitoring/Compliance Verification Report" condition in section 9.C. The permittee shall include a written statement from the responsible official, which certifies the truth, accuracy, and completeness of the reports. [Re: *APCD Rules 1303.D.1, 1302.D.3, 1303.2.c*]
- A.9 **Federally-Enforceable Conditions.** Each federally-enforceable condition in this permit shall be enforceable by the USEPA and members of the public. None of the conditions in the APCD-only enforceable section of this permit are federally-enforceable or subject to the public/USEPA review. [Re: *CAAA, § 502(b)(6), 40 CFR 70.6*]
- A.10 **Recordkeeping Requirements.** Records of required monitoring information shall include the following:
- (a) The date, place as defined in the permit, and time of sampling or measurements;
  - (b) The date(s) analyses were performed;
  - (c) The company or entity that performed the analyses;
  - (d) The analytical techniques or methods used;

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- (e) The results of such analyses; and
- (f) The operating conditions as existing at the time of sampling or measurement;

The records (electronic or hard copy), as well as all supporting information including calibration and maintenance records, shall be maintained for a minimum of five (5) years from date of initial entry by the permittee and shall be made available to the APCD upon request. [*Re: APCD Rule 1303.D.1.f, 40CFR70.6(a)(3)(ii)(A)*]

A.11 **Conditions for Permit Reopening.** The permit shall be reopened and revised for cause under any of the following circumstances:

- (a) **Additional Requirements:** If additional applicable requirements (e.g., NSPS or MACT) become applicable to the source which has an unexpired permit term of three (3) or more years, the permit shall be reopened. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. However, no such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended. All such re-openings shall be initiated only after a 30-day notice of intent to reopen the permit has been provided to the permittee, except that a shorter notice may be given in case of an emergency.
- (b) **Inaccurate Permit Provisions:** If the APCD or the USEPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit, the permit shall be reopened. Such re-openings shall be made as soon as practicable.
- (c) **Applicable Requirement:** If the APCD or the USEPA determines that the permit must be revised or revoked to assure compliance with any applicable requirement including a federally-enforceable requirement, the permit shall be reopened. Such re-openings shall be made as soon as practicable.

Administrative procedures to reopen and revise/revoke/reissue a permit shall follow the same procedures as apply to initial permit issuance. Re-openings shall affect only those parts of the permit for which cause to reopen exists.

If a permit is reopened, the expiration date does not change. Thus, if the permit is reopened, and revised, then it will be reissued with the expiration date applicable to the re-opened permit. [*Re: 40 CFR 70.7, 40 CFR 70.6*]

A.12 **Grounds for Revocation.** Failure to abide by and faithfully comply with this permit or any Rule, Order, or Regulation may constitute grounds for the APCO to petition for permit revocation pursuant to California Health & Safety Code Section 42307 *et seq.*

**9.B. Generic Conditions**

B.1 **Circumvention (Rule 301):** A person shall not build, erect, install, or use any article, machine, equipment or other contrivance, the use of which, without resulting in a reduction in the total

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release of air contaminants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Division 26 (Air Resources) of the Health and Safety Code of the State of California or of these Rules and Regulations. This Rule shall not apply to cases in which the only violation involved is of Section 41700 of the Health and Safety Code of the State of California, or of APCD Rule 303. [Re: APCD Rule 301]

**B.3 Nuisance (Rule 303):** No pollutant emissions from any source at the permittee shall create nuisance conditions. Operations shall not endanger health, safety or comfort, nor shall they damage any property or business. [Re: APCD Rule 303]

**9.C Requirements and Equipment Specific Conditions**

No conditions in this section of PTO/Part-70 Permit 8240-R6 are superseded as a result of this permitting action. Therefore, all permit conditions in PTO/Part-70 Permit 8240-R6 remain in full force.



AIR POLLUTION CONTROL OFFICER

AUG 31 2007

DATE

Attachments:

- Permit Equipment List
- Permit Evaluation for Permit to Operate 12144

Note:

1. This permit supersedes ATC 12144 issued February 12, 2007 and ATC 12144-01 issued May 18, 2007.
2. Next Reevaluation Due: March 2009

PERMIT EQUIPMENT LIST - TABLE A

**Santa Barbara County APCD – Equipment List**

PTO 12144 / FID: 03321 Newlove Lease / SSID: 02667

**A PERMITTED EQUIPMENT**

**1 Vapor Recovery System**

<i>Device ID #</i>	<b>109241</b>	<i>Device Name</i>	<b>Vapor Recovery System</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	3.00 Horsepower (Electric Motor)
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Serving the wash tanks, crude storage tank, and wastewater tank. The vapor recovery efficiency is assumed to be 95% by weight at each vapor recovery point. The system is equipped with a Hybon Model HB 25 compressor (serial # 10719705), driven by a 3HP Baldor Industries electric motor (serial # F 0612220935).		

**E DE-PERMITTED EQUIPMENT**

**1 Vapor Recovery System**

<i>Device ID #</i>	<b>101179</b>	<i>Device Name</i>	<b>Vapor Recovery System</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Depermitted</i>		<i>Facility Transfer</i>	
<i>Device Description</i>	Serving the wash tanks, crude storage tank, and wastewater tanks. The vapor recovery efficiency is assumed to be 95% by weight at each vapor recovery point. The system is equipped with a Corken compressor, driven by a gas internal combustion engine.		



## PERMIT EVALUATION FOR PERMIT TO OPERATE 12144

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### **1.0 BACKGROUND**

- 1.1 General: Authority to Construct 12144 was issued on February 12, 2007 authorizing the replacement of the existing Corken vapor recovery compressor with a new Hybon Model HB 25 vapor recovery compressor at the Newlove Lease tank battery. During operation under SCDP, the permittee experienced high compressor rpm breakdowns because the 2 horsepower electric motor drive was underpowered. An application was submitted and ATC modification 12144-01 was issued on May 18, 2007 allowing the replacement of the 2 horsepower motor with a 3 horsepower motor.
- 1.2 Permit History: See Section 1.2 of Part 70 Operating Permit and Permit to Operate 8240-R6.
- 1.3 Compliance History: See Section 3.5 of Part 70 Operating Permit and Permit to Operate 8240-R6.

### **2.0 ENGINEERING ANALYSIS**

- 2.1 Equipment/Processes: The vapor recovery system serves the lease tank battery. The vapors collected by the vapor recovery compressor, along with the produced gas, are used as fuel gas on the Orcutt Hill Field. This permit action replaces a Corken IC engine driven compressor with a Hybon Model HB 25 compressor driven by a 3HP Baldor Industries electric motor. While the current Newlove tank battery vapor recovery compressor will be depermitted as part of this action, the IC engine used to power the Corken compressor will remain permitted as APCD Device Number 004403 under PTO 8039.
- 2.2 Emission Controls: The tank battery is equipped with a vapor recovery system. The permitted compressor is a part of this vapor recovery system. A 95-percent control efficiency is applied for the use of vapor recovery.
- 2.3 Emission Factors: Emission factors for each equipment item are based on those used in PTO 8240-R6.
- 2.4 Reasonable Worst Case Emission Scenario: Worst case emissions are based on operation of this facility 24 hours/day, 365 days per year at maximum permitted throughput levels.
- 2.5 Emission Calculations: Detailed emission calculation spreadsheets may be found in PTO 8240-R6. These emissions define the Potential to Emit for the tank battery controlled by the permitted equipment.

PERMIT EVALUATION FOR  
PERMIT TO OPERATE 12144

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- 2.6 Special Calculations: Vapor recovery compressor horsepower calculations are included in Attachment A.
- 2.7 BACT Analyses: Best Available Control Technology was not required for this project.
- 2.8 Enforceable Operational Limits: The permit has enforceable operating conditions that ensure the control device is operated properly.
- 2.9 Monitoring Requirements: Monitoring of the equipment's operational limits are required to ensure that these are enforceable. This permit requires monitoring the volume of oil produced, the volume of oil trucked from the facility and the parameters required by APCD Rules 325.F, 331.G, and 346.G.
- 2.10 Recordkeeping and Reporting Requirements: The permit requires that the data which is monitored be recorded and reported to the APCD.

**3.0 REEVALUATION REVIEW (not applicable)**

**4.0 REGULATORY REVIEW**

- 4.1 Partial List of Applicable Rules: This project is anticipated to operate in compliance with the following rules:

- Rule 101. Compliance of Existing Facilities
- Rule 202. Exemptions to Rule 201
- Rule 205. Standards for Granting Permits
- Rule 303. Nuisance
- Rule 310. Odorous Organic Sulfides
- Rule 325. Crude Oil Production and Separation
- Rule 331. Fugitive Emissions Inspection and Maintenance
- Rule 505. Breakdown Procedures
- Rule 801. New Source Review
- Rule 802. Nonattainment Review
- Rule 803. Prevention of Significant Deterioration

- 4.2 Rules Requiring Review: None

- 4.3 NEI Calculations: The net emission increase calculation is used to determine whether certain requirements must be applied to a project (e.g., offsets, AQIA, PSD BACT). The NEI values for the stationary source (the I, P1, P2 and D terms of the NEI calculation) are documented in Attachments "B" and "C". There is no increase to the tank battery emissions as controlled by the vapor recovery system as a result of this permit action, therefore there is no resultant adjustment to the Newlove Lease facility Net Emission Increase. The source indicated no new piping or components are added. This was confirmed during the SCDP inspection.

**5.0 AQIA**

The project is not subject to the Air Quality Impact Analysis requirements of Regulation VIII.

PERMIT EVALUATION FOR  
PERMIT TO OPERATE 12144

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**6.0 OFFSETS/ERCs**

6.1 General: The emission offset thresholds of Regulation VIII are shown to be exceeded for NO<sub>x</sub> and ROC in the Stationary Source NEI table in Attachment C. The NEI offset threshold was exceeded as a result of permitting the construction of Phase 1 and Phase 2 of the Diatomite Thermal Enhancement Project on the Newlove Lease under ATC 12084. As a the requirement of ATC 12084, emission reduction credits are required to be surrendered prior to the onset of construction of Phase 2 to offset the NEI NO<sub>x</sub> and ROC.

6.2 Offsets: Offsets are not required for this permitting action.

6.3 ERCs: This source does generate emission reduction credits

**7.0 AIR TOXICS**

An air toxics health risk assessment was not performed for this permitting action.

**8.0 CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REVIEW:**

This project is exempt from CEQA pursuant to the Environmental Review Guidelines for the Santa Barbara County APCD (revised November 16, 2000). Appendix A.1 (*APCD Projects Exempt from CEQA*) specifically exempts Permits to Operate. No further action is necessary.

**9.0 SCHOOL NOTIFICATION PROCESS**

A school notice pursuant to the requirements of H&SC §42301.6 was not required.

**10.0 PUBLIC and AGENCY NOTIFICATION PROCESS/COMMENTS ON DRAFT PERMIT**

This project was not subject to public notice. The draft PTO and Proposed Part 70 Minor Modification was submitted to the permittee and to EPA for review. In a letter dated June 21, 2007, the permittee stated they had no comments. No comments were received from EPA.

**11.0 FEE DETERMINATION**

Fees for the APCD's work efforts are assessed on a fee basis. The Project Code is 300000 (*Oil & Gas*). The fee calculations may be found in Attachment "D".

**12.0 RECOMMENDATION**

It is recommended that this permit be granted with the conditions as specified in the permit.

<u>Al Ronyec <i>AR</i></u> AQ Engineer	<u>8-30-07</u> Date	<u><i>Rui Ang</i></u> Engineering Supervisor	<u>8/30/07</u> Date
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**ATTACHMENTS**

- A. Emission Calculations
- B. IDS Tables
- C. Facility/SS NEI Tables
- D. Fee Statement

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## Attachment A

VERTICAL FIXED ROOF  
ORGANIC LIQUID STORAGE  
Form A. Supplemental Information for Vapor Recovery Compressor (VRCs)

Page 1 of 2

1.  Is the VRC new?
2.  Is the VRC an existing permitted item of equipment?

PTO # \_\_\_\_\_  
Equipment Item # \_\_\_\_\_

**Design Information.**

3. Gas flow rate design capacity in standard cubic feet per minute? 41,000 Scfm  
\_\_\_\_\_ (Min) Scfm  
\_\_\_\_\_ (Max) Scfm
4. Gas composition used for vapor recovery design? *Attached a separate sheet*
5. Gas specific gravity? APPROX\*\* (air = 1.00) \*\*0.8
6. Daily and annual throughput data? 41,000 (scf/day) design  
\_\_\_\_\_ (scf/year) design  
\_\_\_\_\_ (scf/day) actual  
\_\_\_\_\_ (scf/year) actual
7. Crude oil API gravity and true vapor pressure? \_\_\_\_\_ ° API \_\_\_\_\_ psia @ \_\_\_\_\_ °F Design  
\_\_\_\_\_ ° API \_\_\_\_\_ psia @ \_\_\_\_\_ °F Actual
8. Suction Pressure? 0 \_\_\_\_\_ (Min/Max)
9. Suction Temperature? 120 F \_\_\_\_\_ (Min/Max)
10. Discharge Temperature? 178 F Max \_\_\_\_\_ After cooling
11. Discharge Pressure? 5 lbs \_\_\_\_\_ (Min/Max)
12. Discharge relief valve set at 20 ~~xxxxxxx~~ PSIG (on compressor)
13. Tank pressure relief valve set at 1.5 oz/sq. inch
14. Compressor unit starts at 2" WC oz/sq. inch tank pressure
15. Partial bypass open at 1.0" WC oz/sq. inch tank pressure
16. Full bypass opens at 0.9" WC oz/sq. inch tank pressure

VERTICAL FIXED ROOF  
ORGANIC LIQUID STORAGE  
Form A. Supplemental Information for Vapor Recovery Compressor (VRCs)

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17. Recycle timer set at N/A minutes
18. Compressor unit stops at 0.2" WC<sub>oz/sq.</sub> inch tank pressure
19. Gas blanket closed at 0.9" WC<sub>oz/sq.</sub> inch tank pressure
20. Gas blanket full open at 0.7" WC<sub>oz/sq.</sub> inch tank pressure
21. Tank vacuum relief set at 1.5 oz/sq. inch tank pressure
22. What is the size of the vapor recovery piping? Varies\* Inner diameter in inches \*4" - 2"
23. How is the suction pressure on the VRC controlled:
- The VRC discharge recycles back to the suction of the VRC
  - Low pressure, or high vacuum shuts down the VRC
  - Gas makeup on high vacuum or low pressure
  - Other (Describe fully through P&IDs, Process Flow Diagrams, and process Descriptions)  
Pressure Controller and VFD
24. Is the VRC suction pressure monitored by:
- A pressure gauge
  - A pressure alarm system
  - A pressure indicator/recorder system
  - Other (describe)  
Pressure Transmitter

Compressor: Hy-Bon Rotary Vane, Model HB-25

**Operating Parameters for Hy-Bon Rotary Vane, Model HB-25**

Variable	Value	Units	
Suction Pressure	0	psig	
Suction Pressure	14.7	psia	$P_S$
Discharge Pressure	5	psig	
Discharge Pressure	19.7	psia	$P_D$
Rated Gas Flow Rate	0.041	mmscf/d	$Q_R$
Calculated Gas Flow Rate	0.00366	mmscf/d	$Q_C$
Number of Stages	1		

**Vapor Recovery Compressor Brake Horsepower (BHP) Calculations**

**Equations:**

Compression Ratio (R) = Absolute Discharge Pressure ( $P_D$ ) / Absolute Suction Pressure  $P_S$

BHP = 22 x Compression Ratio (R) x Gas Flow Rate [ $Q$ , mmscf/d]

**Calculations:**

Compression Ratio = (19.7 psig) / (14.7 psig) = 19.7 / 14.7 = 1.34

BHP (Rated) = 22 x 1.34 x 0.041 = 1.21 hp

BHP (Calculated) = 22 x 1.34 x 0.00366 = 0.11 hp

**Calculations show use of 3 HP motor adequate for driving compressor.**

## Attachment B

**IDS Database Emission Tables**

**Table 1  
Potential to Emit (PPTE)**

	<b>NO<sub>x</sub></b>	<b>ROC</b>	<b>CO</b>	<b>SO<sub>x</sub></b>	<b>TSP</b>	<b>PM<sub>10</sub></b>
<b>PTO 12144</b>						
lb/day						
tons/year						

Note: No PTE resulting from this permitting action. Tank battery emissions included in Facility PTE.

**Table 2  
Facility Potential to Emit (FPTE)**

	<b>NO<sub>x</sub></b>	<b>ROC</b>	<b>CO</b>	<b>SO<sub>x</sub></b>	<b>TSP</b>	<b>PM<sub>10</sub></b>
<b>PTO 8240 – Newlove Lease</b>						
lb/day		79.89				
tons/year		14.58				

**Table 3  
Federal PT-70 Facility Potential to Emit (PT70 FPTE)**

	<b>NO<sub>x</sub></b>	<b>ROC</b>	<b>CO</b>	<b>SO<sub>x</sub></b>	<b>TSP</b>	<b>PM<sub>10</sub></b>
<b>PTO 8240 – Newlove Lease</b>						
lb/day		31.85				
tons/year		5.82				

**Table 4  
Facility Net Emission Increase Since 1990 (FNEI-90)**

	<b>NO<sub>x</sub></b>	<b>ROC</b>	<b>CO</b>	<b>SO<sub>x</sub></b>	<b>TSP</b>	<b>PM<sub>10</sub></b>
<b>PTO 8240 – Newlove Lease</b>						
lb/day	49.50	52.06	85.50	16.66	27.00	27.00
tons/year	9.03	7.44	15.60	3.04	4.93	4.93

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## Attachment C

Facility Emissions Summary  
Newlove Lease FID 3321

I. This Projects "I" NEI-90

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr										
P12144	8/31/2007												

II. This Facility's "P1s"

Enter all facility "P1" NEI-90s below:

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
P11909	5/23/2006			1.50	0.27								
A12084	6/5/2007	49.50	9.03	52.06	7.44	85.50	15.60	16.66	3.04	27.00	4.93	27.00	4.93
<b>Totals</b>		<b>49.50</b>	<b>9.03</b>	<b>53.56</b>	<b>7.71</b>	<b>85.50</b>	<b>15.60</b>	<b>16.66</b>	<b>3.04</b>	<b>27.00</b>	<b>4.93</b>	<b>27.00</b>	<b>4.93</b>

Notes:

- (1) Facility NEI from IDS.
- (2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding.
- (3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.

III. This Facility's "P2" NEI-90 Decreases

Enter all facility "P2" NEI-90s below:

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr										
<b>Totals</b>		<b>0.00</b>											

Notes:

- (1) Facility NEI from IDS.
- (2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding.
- (3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.

IV. This Facility's Pre-90 "D" Decreases

Enter all facility "D" decreases below:

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr										
P11909	5/23/2006			1.50	0.27								
<b>Totals</b>		<b>0.00</b>	<b>0.00</b>	<b>1.50</b>	<b>0.27</b>	<b>0.00</b>							

Notes:

- (1) Facility "D" from IDS.
- (2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding.
- (3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.

V. Calculated This Facility's NEI-90

Table below summarizes facility NEI-90 as equal to: I+ (P1-P2) -D

Term	NOx		ROC		CO		SOx		PM		PM10	
	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
Project "I"	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P1	49.50	9.03	53.56	7.71	85.50	15.60	16.66	3.04	27.00	4.93	27.00	4.93
P2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
D	0.00	0.00	1.50	0.27	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>FNEI-90</b>	<b>49.50</b>	<b>9.03</b>	<b>52.06</b>	<b>7.44</b>	<b>85.50</b>	<b>15.60</b>	<b>16.66</b>	<b>3.04</b>	<b>27.00</b>	<b>4.93</b>	<b>27.00</b>	<b>4.93</b>

Notes:

- (1) Resultant FNEI-90 from above Section I thru IV data.
- (2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding.
- (3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.

Stationary Source NEI-90 Calculations  
 BreitBurn Energy Company LP Orcutt Hill Stationary Source

Facility FNEI-90 at this SSN

Enter all other facility NEI-90s below:

Facility No.	Date Revised	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
3206		0.00	0.00	1.78	0.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3313		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3314		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3316		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3318		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3319		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3320		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3321		49.50	9.03	52.06	7.44	85.50	15.60	16.66	3.04	27.00	4.93	27.00	4.93
3322		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3323		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3324		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3495		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4104		0.00	0.00	0.55	0.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4214		11.04	0.23	0.60	0.01	9.27	0.19	0.58	0.01	0.06	0.01	0.06	0.01
10482		6.05	1.09	4.26	0.77	10.49	1.91	2.04	0.37	3.31	0.60	3.31	0.60
1904		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Totals:</b>		<b>66.59</b>	<b>10.35</b>	<b>59.25</b>	<b>8.65</b>	<b>105.26</b>	<b>17.70</b>	<b>19.28</b>	<b>3.42</b>	<b>30.37</b>	<b>5.54</b>	<b>30.37</b>	<b>5.54</b>
Notes:		(1) Facility NEI from IDS. (2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding. (3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.											

Calculate This SSN's NEI-90

Table below summarizes Source NEI-90 as equal to sum of each facility's (unless footnoted by an enforceable NEI scenario)

Term	NOx		ROC		CO		SOx		PM		PM10	
	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
<b>SSN NEI-90</b>	<b>66.59</b>	<b>10.35</b>	<b>59.25</b>	<b>8.65</b>	<b>105.26</b>	<b>17.70</b>	<b>19.28</b>	<b>3.42</b>	<b>30.37</b>	<b>5.54</b>	<b>30.37</b>	<b>5.54</b>
Notes:		(1) Resultant SSN NEI-90 from above Section I thru IV data. (2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding. (3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.										

## Attachment D

**FEE STATEMENT**

PTO No. 12144

FID: 03321 Newlove Lease / SSID: 02667



Santa Barbara County  
Air Pollution Control District

**Device Fee**

Device No.	Device Name	Fee Schedule	Qty of Fee Units	Fee per Unit	Fee Units	Max or Min. Fee Apply?	Number of Same Devices	Pro Rate Factor	Device Fee	Penalty Fee?	Fee Credit	Total Fee per Device
109241	Vapor Recovery System	A2	3.000	29.53	Per total rated hp	No	1	1.000	88.59	0.00	0.00	88.59
<b>Device Fee Sub-Totals =</b>									<b>\$88.59</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$88.59</b>
<b>Device Fee Total =</b>												<b>\$88.59</b>

**Permit Fee**

Fee Based on Devices

88.59

**Fee Statement Grand Total = \$88**

**Notes:**

- (1) Fee Schedule Items are listed in APCD Rule 210, Fee Schedule "A".
- (2) The term "Units" refers to the unit of measure defined in the Fee Schedule.