



**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT



SEP 22 2015

Steve Fisher  
All American Oil & Gas Inc  
7700 Downing Ave  
Bakersfield, CA 93308

**RE: Final – Authority to Construct/Certificate of Conformity (Minor Mod)**  
**Facility Number: S-7858**  
**Project Number: S-1153232**

Dear Mr. Fisher:

The Air Pollution Control Officer has issued the Authority to Construct permits to All American Oil & Gas Inc for connection of an existing feed water tank to vapor control system S-7858-5, at the Nukern Lease in the heavy oil central stationary source.

Enclosed are the Authority to Construct permits. The District's analysis of the proposal was sent to US EPA Region IX on July 29, 2015. No comments were received following the District's preliminary decision on this project.

Prior to operating with the modifications authorized by the Authority to Construct, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5. Application forms have been enclosed for your use. These forms may also be found on the District's website at [www.valleyair.org](http://www.valleyair.org).

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura 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

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**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



# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-7858-5-4

**ISSUANCE DATE:** 09/16/2015

**LEGAL OWNER OR OPERATOR:** ALL AMERICAN OIL & GAS INC.

**MAILING ADDRESS:** P O BOX 10207  
C/O ENTERPRISE DRILLING  
BAKERSFIELD, CA 93389

**LOCATION:** HEAVY OIL CENTRAL  
SEC 6, T29S, R28E  
CA

**SECTION:** NE6 **TOWNSHIP:** 29S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 1,500 BBL FIXED ROOF WASH TANK (T-100) SERVED BY A VAPOR RECOVERY SYSTEM INCLUDING ONE COMPRESSOR SKID AND ONE ADDITIONAL COMPRESSOR SKID SHARED WITH THE VAPOR CONTROL SYSTEM LISTED ON TEOR PERMIT S-7858-3 (NUKERN LEASE): CONNECT TANK S-7858-23 TO VAPOR CONTROL SYSTEM AND SPECIFY THAT TANKS '-4, '-6, '-7, '-8, '-9, '-10, '-11, '-12, '-13, AND '-23 SHARE THE VAPOR CONTROL SYSTEM

## CONDITIONS

1. ATC shall be implemented concurrently with ATC S-7858-23-0. [District Rule 2201] Federally Enforceable Through Title V Permit
2. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
3. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
4. The tank shall be equipped with a fixed roof with no holes or openings. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 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



Renaud Marjollet, Director of Permit Services

S-7858-5-4 : Sep 16 2015 8:13AM -- EDGEHLR : Joint Inspection NOT Required

6. The VOC content of tank recovery gas shall not exceed 10% by weight. [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. 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 and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
9. 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, an approved VOC destruction device that reduces the inlet VOC emissions by at least 99% by weight as determined by the test method specified in Section 6.4.7, or vapors shall be injected into DOGGR approved wells. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Operator shall conduct quarterly gas sampling for gas exiting the separator pressure vessel to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
11. 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 Rule 4623] Federally Enforceable Through Title V Permit
12. 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] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
14. 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] Federally Enforceable Through Title V Permit
15. 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



# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-7858-23-0

**ISSUANCE DATE:** 09/16/2015

**LEGAL OWNER OR OPERATOR:** ALL AMERICAN OIL & GAS INC.

**MAILING ADDRESS:** P O BOX 10207  
C/O ENTERPRISE DRILLING  
BAKERSFIELD, CA 93389

**LOCATION:** HEAVY OIL CENTRAL  
SEC 6, T29S, R28E  
CA

**SECTION:** NE 6 **TOWNSHIP:** 29S **RANGE:** 28E

**EQUIPMENT DESCRIPTION:**

3000 BBL FIXED ROOF STORAGE TANK SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-7858-5 (NUKERN LEASE)

## CONDITIONS

1. ATC shall be implemented concurrently with ATC S-7858-5-4. [District Rule 2201] Federally Enforceable Through Title V Permit
2. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
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Arnaud Marjollet, Director of Permit Services  
S-7858-23-0 Sep 16 2015 8:13AM -- EDGEHILR . Joint Inspection NOT Required

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