



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

MAY 25 2012

Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

Re: **Proposed Authority to Construct / Certificate of Conformity (Minor Mod)
District Facility # S-1738
Project # S-1120598**

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authority to Construct for Vintage Production California, LLC, located at Light Oil Western stationary source in Kern County, which has been issued a Title V permit. Vintage Production California, LLC is requesting that a Certificate of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. The project is to add an organic liquid loading rack connected to the vapor control system (VCS) and allow the VCS to vent to gas plant, fuel system or flare.

Enclosed is the engineering evaluation of this application, a copy of the current Title V permit, and proposed Authority to Construct # S-1738-240-7 with Certificate of Conformity. After demonstrating compliance with the Authority to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter. 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,

David Warner
Director of Permit Services

Enclosures
cc: Dolores Gough, Permit Services

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
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San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

MAY 25 2012

Phil Acosta
Vintage Production California, LLC
9600 Ming Ave.; Suite 300
Bakersfield, CA 93311

**Re: Proposed Authority to Construct / Certificate of Conformity (Minor Mod)
District Facility # S-1738
Project # S-1120598**

Dear Mr. Acosta:

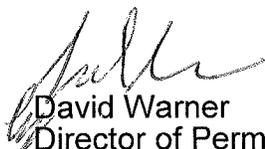
Enclosed for your review is the District's analysis of your application for Authority to Construct for the facility identified above. You have requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The project is to add an organic liquid loading rack connected to the vapor control system (VCS) and allow the VCS to vent to gas plant, fuel system or flare.

After addressing any EPA comments made during the 45-day comment period, the Authority to Construct will be issued to the facility with a Certificate of Conformity. Prior to operating with modifications authorized by the Authority to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

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,



David Warner
Director of Permit Services

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be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. VPC must apply to administratively amend their Title V permit.

Appendix A: Current PTO S-1738-240-5 and ATC S-1738-240-6

II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (4/21/11)
Rule 2520	Federally Mandated Operating Permits (6/21/01)
Rule 4102	Nuisance (12/17/92)
Rule 4201	Particulate Matter Concentration (12/17/92)
Rule 4623	Storage of Organic Liquids (5/19/05)
Rule 4624	Transfer of Organic liquid (12/20/07)
Rule 4801	Sulfur Compounds (12/17/92)
CH&SC 41700	Health Risk Assessment
CH&SC 42301.6	School Notice
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)	
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines	

III. Project Location

The facility is located in the Paloma Oilfield in the SW4 of Section 3, T32S, R26E within VPC's Light Oil Western stationary source (S-1738). The equipment is not located within 1,000 feet of the outer boundary of a K-12 school; therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

The Paloma facility handles the produced fluids from the oil wells at VPC's Paloma field. Initial oil/water separation occurs in Tank S-1738-244 (wash tank). Then the oil is stored in storage tanks '-240 through '-243 from which the oil will be shipped from the facility. VPC currently ships their oil via pipeline. The proposed loading rack will be used if pipeline sales are interrupted.

V. Equipment Listing

Pre-Project Equipment Description:

ATC S-1738-240-6: 16,926 GALLON FIXED ROOF PETROLEUM STORAGE TANK #5335 WITH VAPOR RECOVERY SYSTEM INCLUDING 12 HP COMPRESSOR SERVING PERMITS S-1738-241 THROUGH '-246 (PALOMA PROJECT); CONNECT UP TO FOUR (4) 500 BBL

PORTABLE TANKS (S-1738-451 THROUGH '454) TO VAPOR CONTROL SYSTEM

Proposed Modification:

S-1738-240-7: MODIFICATION OF 16,926 GALLON FIXED ROOF PETROLEUM STORAGE TANK #5335 WITH VAPOR RECOVERY SYSTEM INCLUDING 12 HP COMPRESSOR SERVING PERMITS S-1738-241 THROUGH '246 AND FOUR (4) PORTABLE TANKS S-1738-451 THROUGH '454 (PALOMA PROJECT): *ADD ORGANIC LIQUID LOADING RACK, REMOVE THROUGHPUT AND TVP LIMITS, REMOVE REFERENCE TO "12 HP" COMPRESSOR IN EQUIPMENT DESCRIPTION, AND ALLOW VAPOR RECOVERY SYSTEM TO VENT TO GAS PLANT, FUEL SYSTEM, RE-INJECTION, OR FLARE*

Post Project Equipment Description:

S-1738-240-7: 16,926 GALLON FIXED ROOF PETROLEUM STORAGE TANK #5335 AND ORGANIC LIQUID LOADING RACK CONNECTED TO VAPOR RECOVERY SYSTEM SERVING PERMITS S-1738-241 THROUGH '246 AND S-1738-451 THROUGH '454 (PALOMA PROJECT)

VI. Emission Control Technology Evaluation

VOCs are the emissions of concern with oil tanks and loading racks. No other criteria pollutants are emitted.

Tank S-1738-240 is currently connected to a Rule 4623 compliant vapor recovery system. The vapor return line from the loading rack will be connected to the vapor piping manifold connecting several tanks to a gas compressor that subsequently discharges to the gas sales line. Dry-break couplers will be installed and connected to the vapor and product lines to prevent any leaks. A 99% VOC control efficiency is expected for the new organic liquid loading rack.

VII. General Calculations

A. Assumptions

- The vapor control system is in a leak-free condition and is required to be 99% efficient by permit condition
- Loading rack emissions are based on fugitive component counts and disconnect losses
- Density of California crude oil is 915 kg/cubic meter (Project S-1083754 for the same facility)
- Maximum number of disconnects per day is 12 (per applicant)

B. Emission Factors

Emissions from this project consist of fugitive emissions and disconnect emissions. The fugitive emissions from the tank and loading rack components are quantified based on emission factors 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.

Disconnect emissions are taken from Rule 4624 which defines excess organic liquid drainage to be more than 10 ml per disconnect. A "disconnect" is performed every time the loading line is hooked to and *disconnected* from a delivery truck.

C. Calculations

1. Pre-Project Potential to Emit (PE1)

The PE1 emissions include the fugitive emissions from the existing tank and the new portable tanks proposed in ATC '-240-6:

$$\text{VOC} = 0.8 \text{ lb/day (299 lb/yr)}$$

2. Post Project Potential to Emit (PE2)

The PE2 consists of the tanks and proposed loading rack fugitive emissions and disconnect emissions, included in **Appendix B**.

Disconnect emissions are taken from Rule 4624 which defines excess organic liquid drainage to be more than 10 ml per disconnect. A "disconnect" is performed every time the loading line is hooked to and *disconnected* from a delivery truck.

Using an oil density of 915 kg/m³, and assuming that the VOC content of the oil lost is 100%, the quantity of oil lost per disconnect is:

$$\frac{10 \text{ ml} \cdot \text{VOC}}{\text{disconnect}} \times \frac{1 \text{ m}^3}{10^6 \text{ ml}} \times \frac{915 \text{ kg}}{\text{m}^3} \times \frac{2.2 \text{ lb}}{\text{kg}} = 0.02 \frac{\text{lb} \cdot \text{VOC}}{\text{disconnect}}$$

At 12 disconnects per day, the total emissions from disconnects is 0.24 lb/day.

VOC PE2		
Existing tanks with vapor control emissions	0.8 lb/day	299 lb/yr
Loading rack emissions	0.1 lb/day	37 lb/yr
Disconnect emissions	0.2 lb/day	88 lb/yr
Total emissions	1.1 lb/day	424 lb/yr

Greenhouse Gas Emissions (GHG):

There may be a slight increase in greenhouse gas emissions due to fugitive emissions resulting from the loading rack. The potential increase is estimated as follows:

For GHG calculations purposes, VOC can be assumed to be 85% of total organic carbon (TOC) (AP-42 Sec. 5.2); also assume 15% of TOC is CH₄ (methane) if site specific data is not available (2009 API Compendium, E-6); and global warming potential (GWP) for CH₄ is 21 lb-CO₂e/lb-CH₄ (District Policy APR 2015):

Therefore:

$$\text{CH}_4 = (\text{VOC} \times 0.15) / 0.85$$

$$\text{VOC increase} = 424 - 299 = 125 \text{ lb/yr}$$

$$\text{Total CH}_4 = (125 \text{ lb/yr} \times 0.15) / 0.85 = 22 \text{ lb/yr}$$

$$\text{CO}_2\text{e (mton/yr)} = \text{CH}_4 \text{ (lb/yr)} \times 1\text{-mton}/2,200 \text{ lb} \times 21$$

$$= 22 \times 1/2,200 \times 21$$

$$= 0.2 \text{ mton/yr} < 230 \text{ mton CO}_2\text{e/yr}$$

Per District Policy 2015, project specific greenhouse gas emissions less than or equal to 230 M-tons of CO₂e/yr are considered to be zero for District permitting purposes.

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to Section 4.9 of District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

The SSPE1 emissions are from Project S-1120055, the last project to be finalized with SSPE calculations.

Pre Project Stationary Source Potential to Emit [SSPE1] (lb/year)					
Permit Unit	NO _x	SO _x	PM ₁₀	CO	VOC
Pre Project SSPE (SSPE1)	155,603	42,853	10,556	3,461,713	216,258

4. Post Project Stationary Source Potential to Emit (SSPE2)

Pursuant to Section 4.10 of District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with

valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

The SSPE2 is calculated by adding the PE2 from the subject unit to the SSPE1.

Post Project Stationary Source Potential to Emit [SSPE2] (lb/year)					
Permit Unit	NO _x	SO _x	PM ₁₀	CO	VOC
S-1738-240-7	0	0	0	0	125
SSPE1	155,603	42,853	10,556	3,461,713	216,258
Post Project SSPE (SSPE2)	155,603	42,853	10,556	3,461,713	216,383

5. Major Source Determination

Pursuant to Section 3.24 of District Rule 2201, a Major Source is a stationary source with post-project emissions or a Post Project Stationary Source Potential to Emit (SSPE2), equal to or exceeding one or more of the following threshold values. However, Section 3.24.2 states, "for the purposes of determining major source status, the SSPE2 shall not include the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site."

Major Source Determination (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
Pre-Project SSPE (SSPE1)	155,603	42,853	10,556	3,461,713	216,258
Post Project SSPE (SSPE2)	155,603	42,853	10,556	3,461,713	216,383
Major Source Threshold	20,000	140,000	140,000	200,000	20,000
Major Source?	Yes	No	No	Yes	Yes

As seen in the table above, the facility is an existing Major Source for NO_x, VOC and CO and will remain a major source for these pollutants with this project.

6. Baseline Emissions (BE)

The BE calculation (in lbs/year) is performed pollutant-by-pollutant for each unit within the project, to calculate the QNEC and if applicable, to determine the amount of offsets required.

Pursuant to Section 3.7 of District Rule 2201, BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to Section 3.22 of District Rule 2201.

Pursuant to Rule 2201, Section 3.12, a Clean Emissions Unit is defined as an emissions unit that is equipped with an emissions control technology with a minimum control efficiency of at least 95% or is equipped with emission control technology that meets the requirements for achieved-in-practice BACT as accepted by the APCO during the five years immediately prior to the submission of the complete application.

The equipment is connected to a vapor recovery system with a VOC control efficiency of 99%; therefore, the equipment can be considered a clean emissions unit and BE = PE1 for VOC.

7. SB 288 Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

Since this source is not included in the 28 specific source categories specified in 40 CFR 51.165, the increases in fugitive emissions are not included in the SB288 Major Modification determination. Therefore, this project is not an SB288 Major modification.

8. Federal Major Modification

District Rule 2201, Section 3.17 states that Federal Major Modifications are the same as "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

Since this source is not included in the 28 specific source categories specified in 40 CFR 51.165, the increases in fugitive emissions are not included in the Federal Major Modification determination. Therefore, this project is not a Federal Major Modification.

9. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District’s PAS emissions profile screen. The QNEC is calculated as follows:

$$\text{QNEC (lb/qtr)} = (\text{PE2} - \text{PE1}) \div 4 \text{ quarters per year}$$

QNEC (lb-VOC/qtr)			
Permit Unit	PE2 (lb/yr)	PE1 (lb/yr)	QNEC (lb/qtr)
S-377-240-7	424	299	31

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless exempted pursuant to Section 4.2, BACT shall be required for the following actions:*

- a. Any new emissions unit with a potential to emit exceeding two pounds per day,
- b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
- c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
- d. Any new or modified emissions unit, in a stationary source project, which results in an SB288 Major Modification or a Federal Major Modification, as defined by the rule.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

However, District policy APR 1130 is to consider an increase in potential to emit (IPE) of less than or equal to 0.5 lb/day to be rounded to zero for the purposes of triggering NSR requirements. The IPE as calculated below is less than 0.5 lb/day; therefore, BACT is not required for this project.

$$\begin{aligned} \text{IPE (lb/day)} &= \text{PE2} - \text{PE1} \\ &= 1.1 - 0.8 = 0.3 \text{ lb-VOC/day} \end{aligned}$$

B. Offsets

1. Offset Applicability

Pursuant to Section 4.5.3, offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the Post Project Stationary Source Potential to Emit (SSPE2) equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The following table compares the post-project facility-wide annual emissions in order to determine if offsets will be required for this project.

Offset Determination (lb/year)					
	NO_x	SO_x	PM₁₀	CO	VOC
Post Project SSPE (SSPE2)	155,603	42,853	10,556	3,461,713	216,383
Offset Threshold	20,000	54,750	29,200	200,000	20,000
Offsets triggered?	Yes	No	No	Yes	Yes

However, District policy APR 1130 is to consider an IPE of less than or equal to 0.5 lb/day to be rounded to zero for the purposes of triggering NSR requirements. The IPE as calculated above is less than 0.5 lb/day; therefore, offsets are not required for this project.

C. Public Notification

1. Applicability

Public noticing is required for:

- a. New Major Sources, Federal Major Modifications, and SB288 Major Modifications,
- b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- c. Any project which results in the offset thresholds being surpassed, and/or
- d. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant.

However, District policy APR 1130 is to consider an IPE of less than or equal to 0.5 lb/day to be rounded to zero for the purposes of triggering NSR requirements. The IPE as calculated above is less than 0.5 lb/day; therefore, public noticing is not required for this project.

D. Daily Emission Limits (DELs)

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Section 3.15 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.15.1 and

3.15.2, the DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

Proposed Rule 2201 DELs:

- Emissions from the loading rack connected to tank S-1738-240 shall not exceed 0.3 lb/day. [District Rule 2201]
- Total number of disconnects during loading operations shall not exceed 12 per day. [District Rule 2201]

E. Compliance Assurance

1. Source Testing

Pursuant to District Policy APR 1705, source testing is not required to demonstrate compliance with Rule 2201.

2. Monitoring

No monitoring is required to demonstrate compliance with Rule 2201.

3. Recordkeeping

For this project, recordkeeping is required to demonstrate compliance the daily emissions limit requirements of Rule 2201, and the following condition will be placed on the permit to ensure compliance:

- Daily records of the number of loading rack disconnects shall be maintained, retained on the premises for a period of at least five years and made available for District inspection upon request. [District Rules 1070 and 2201]

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

Rule 2520 Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. The proposed modification is a minor modification to the Title V Permit pursuant to Section 3.20 of this rule:

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.

As discussed above, the facility has applied for a Certificate of Conformity (COC); therefore, the facility must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility may operate under the ATC upon submittal of the Title V administrative amendment.

Rule 4101 Visible Emissions

The purpose of this rule is to prohibit the emissions of visible air contaminants to the atmosphere. The provisions of this rule apply to any source operation which emits or may emit air contaminants.

Per Section 5.0, no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity). Since visible emissions are not expected to occur at loading racks, continued compliance with this rule is expected.

Rule 4102 Nuisance

The purpose of this rule is to protect the health and safety of the public. This rule applies to any source operation which emits or may emit air contaminants or other materials.

Section 4.0 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – Risk Management Policy for Permitting New and Modified Sources specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

An HRA is not required for a project with a total facility prioritization score of less than one. According to the Technical Services Memo for this project (**Appendix C**), the total facility prioritization score including this project was greater than one. Therefore, a health risk assessment was required to determine the short-term acute and long-term chronic exposure from this project.

The cancer risk for this project is shown below:

HRA Summary		
Unit	Cancer Risk	T-BACT Required
S-1738-240-7	2.56E-09	No

Discussion of T-BACT

BACT for toxic emission control (T-BACT) is required if the cancer risk exceeds one in one million. As demonstrated above, T-BACT is not required for this project because the HRA indicates that the risk is below the District's thresholds for triggering T-BACT requirements.

District policy APR 1905 also specifies that the increase in emissions associated with a proposed new source or modification not have acute or chronic indices, or a cancer risk greater than the District's significance levels (i.e. acute and/or chronic indices greater than 1 and a cancer risk greater than 10 in a million). As outlined by the HRA Summary, the emissions increases for this project was determined to be less than significant.

Rule 4201 Particulate Matter Concentration

The purpose of this rule is to protect the ambient air quality by establishing a particulate matter emission standard. This rule applies to any source operation which emits or may emit dust, fumes, or total suspended particulate matter. This rule requires that a person shall not release or discharge into the atmosphere from any single source operation, dust, fumes, or total suspended particulate matter emissions in excess of 0.1 grain per cubic foot of gas at dry standard conditions.

Since particulate matter emissions are not common during loading rack operations, continued compliance with this rule is expected.

Rule 4623 Storage of Organic Compounds

The purpose of this rule is to limit volatile organic compound (VOC) emissions from the storage of organic liquids. This rule applies to any tank with a capacity of 1,100 gallons or greater in which any organic liquid is placed, held, or stored.

The tank (-240) in this project has a capacity greater than 1,100 gallons and store crude oil; therefore, this rule is applicable. All the conditions associated with this rule will be retained in the new ATC to ensure continued compliance with this rule.

Rule 4624 Transfer of Organic Liquid

The purpose of this rule is to limit VOC emissions from the transfer of organic liquids. This project includes one loading rack that is subject to the requirements of this rule. The loading rack will be listed on tank permit S-1738-240-7 so all conditions applicable to the new loading rack shall be listed on the tank permit.

Section 5.1 requires, for a Class 1 organic liquid transfer facility, the emission of VOC from the transfer operation shall not exceed 0.08 pounds per 1,000 gallons of organic liquid transferred and use one of the following systems:

5.1.1 An organic liquid loading operation shall be bottom loaded, or

5.1.2 The VOC from the transfer operation shall be routed to:

A vapor collection and control system;

A fixed roof container that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids);

A floating roof container that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); or

A pressure vessel equipped with an APCO-approved vapor recovery system that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); or

A closed VOC emission control system.

Since the loading rack and the tank are going to be vented to the vapor control system listed in permit S-1738-240, the number of disconnects is limited to 12 per day, drainage from loading rack disconnects is limited to 10 ml per disconnect, and the operator is required to maintain the loading rack in a leak-free state, and repair the leaks within 72 hours of discovery; therefore, the loading rack is expected to comply with Section 5.1.

To ensure compliance with this rule, the following conditions will be on the permit.

- Emissions from the loading rack shall not exceed 0.08 lb per 1,000 gallons of organic liquid transferred. [District Rule 4624]

- VOC emissions from the loading rack shall be vented to the vapor control system listed on this permit. [District Rules 2201 and 4624]
- Total number of disconnects during loading operations shall not exceed 12 per day. [District Rule 2201]
- Drainage from loading rack disconnects shall not exceed 10 ml per disconnect. [District Rule 4624]

Section 5.4 requires that the vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure. To ensure compliance, the following condition will be placed upon the permit:

- Pressure in the delivery tank being loaded shall not exceed 18 inches water column pressure. [District Rule 4624]

Section 5.6 requires that the transfer rack and vapor collection equipment shall be designed, installed, maintained and operated such that there are no leaks and no excess organic liquid drainage at disconnections. Since the applicant has proposed no-leak disconnects at the loading rack, compliance with this section is expected, and the following condition will be placed upon the permit:

- The loading rack shall be designed, installed, maintained and operated such that there are no leaks and no excess organic liquid drainage at disconnections. [District Rules 2201 and 4624]

Since Rule 4624 defines excess organic liquid drainage at disconnections to be 10 ml per disconnect, the following condition will be placed upon the permit:

- Drainage from loading rack disconnects shall not exceed 10 ml per disconnect. [District Rule 4624]

Section 5.9 includes the following leak-inspection requirements:

5.9.1 The operator of an organic liquid transfer facility shall inspect the vapor collection system, the vapor disposal system, and each transfer rack handling organic liquids for leaks during transfer at least once every calendar quarter using the test method prescribed in Section 6.3.8. Therefore, the following conditions will be placed upon permit to ensure compliance:

- The loading rack vapor collection system shall be inspected during loading at least once every calendar quarter using a portable hydrocarbon analyzer in accordance with EPA Method 21. [District Rule 4624]
- A leak in the loading rack's vapor collection system is the detection of any gaseous or vapor emissions with a concentration of VOC greater than 1,000 ppmv above background as methane when measured in accordance with ASTM Method D 287. [District Rule 4624]

- Records of inspections for loading rack leaks, including the date and time of the inspection and the identification of every leaking component, shall be maintained, retained on the premises for a period of at least five years and made available for District inspection upon request. [District Rules 1070 and 4624]

Section 5.9.3 requires that all equipment that is 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 replacement equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. Therefore, the following condition shall be listed on the permit to ensure compliance:

- All loading rack equipment that is 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 replacement equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. [District Rules 2201 and 4624]

Pursuant to Section 6.2.1, the facility shall perform an initial source test of the VOC emission control system in accordance with 40 CFR 60.503 "Test Methods and Procedures" and EPA Methods 2A, 2B, 25A and 25B and ARB Method 422, or APB Test Procedure TP-203.1, in order to establish compliance with the emission factor of 0.08 lb/1,000 gallons of organic liquid loaded. However, Section 6.2.1.3 requires that source testing shall not apply to any Class 1 or 2 organic liquid transfer facility controlling VOC by routing vapors to 1) fixed roof container that meets Rule 4623 control requirements, 2) floating roof container that meets Rule 4623 control requirements, and 3) pressure vessel with vapor recovery system.

The vapor return line from the new loading rack is connected to the vapor piping manifold that connects several tanks to the existing vapor recovery unit. Since the tanks share the same vapor space as the vapor piping manifold, connecting the loading rack vapor return line to the vapor piping manifold has the same effect as connecting directly to either one of the tanks. Therefore, in this case, the exemption from source testing applies to the loading rack. The vapor recovery unit discharges to a sales gas line.

Rule 4801 Sulfur Compounds (December 17, 1992)

The purpose of this rule is to limit the emissions of sulfur compounds and shall apply to any discharge to the atmosphere of sulfur compounds, which would exist as a liquid or a gas at standard conditions. Current emissions of sulfur compounds as SO₂ do not exceed 0.2% by volume. Continued compliance is expected

California Health & Safety Code 42301.6 (School Notice)

The equipment will not be located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Greenhouse Gas (GHG) Significance Determination

It is determined that no other agency has or will prepare an environmental review document for the project. Thus the District is the Lead Agency for this project.

The District's engineering evaluation (this document) demonstrates that the project would not result in an increase in project specific greenhouse gas emissions. The District therefore concludes that the project would have a less than cumulatively significant impact on global climate change.

Per District Policy, project specific greenhouse gas emissions less than or equal to 230 metric tons-CO₂e/year are considered to be zero for District permitting purposes and are exempt from further environmental review.

District CEQA Findings

The District is the Lead Agency for this project because there is no other agency with broader statutory authority over this project. The District performed an Engineering Evaluation (this document) for the proposed project and determined that the activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the

activity will not have a significant effect on the environment. The District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15031 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Issue Authority to Construct S-1738-240-7 subject to the permit conditions on the attached draft Authority to Construct in **Appendix D**.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
S-1738-240-7	3020-05-B	16,926 gal	\$135.00

Appendices

- A: Current PTO S-1738-240-5 and ATC S-1738-240-6
- B: PE Calculations
- C: Health Risk Assessment Summary
- D: Draft ATC
- E: Emissions Profile
- F: Title V Compliance Certification

APPENDIX A

Current PTO S-1738-240-5 and ATC S-1738-240-6

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1738-240-5

EXPIRATION DATE: 02/28/2014

SECTION: SW03 **TOWNSHIP:** 32S **RANGE:** 26E

EQUIPMENT DESCRIPTION:

16,926 GALLON FIXED ROOF PETROLEUM STORAGE TANK #5335 WITH VAPOR RECOVERY SYSTEM INCLUDING 12 HP COMPRESSOR SERVING PERMITS S-1738-241 THROUGH '246 (PALOMA PROJECT)

PERMIT UNIT REQUIREMENTS

1. 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
2. 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, 3.11, 3.17, 3.18, and 6.4.8] Federally Enforceable Through Title V Permit
3. Any 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
4. 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
5. 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
6. 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
7. 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
8. The tank shall be equipped with a vapor loss prevention system consisting of vapor and condensate collection systems capable of reducing VOC emissions by at least 99%. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Tank shall not be used to store or process liquids if the vapor control system is inoperable. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Vapor recovery system shall vent to gas plant (permit S-39-1) only. [District NSR Rule] 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.

11. Average tank throughput shall not exceed 25,200 gallons/day (calculated on a calendar quarter basis). [District NSR Rule] Federally Enforceable Through Title V Permit
12. True vapor pressure of liquid stored shall not exceed 9.8 psia. [District NSR Rule] Federally Enforceable Through Title V Permit
13. VOC emission rate shall not exceed 0.2 lb/hr and 0.59 lb/day. [District NSR Rule] 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 (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 Rule 4623 (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 (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 (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. 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
19. 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
20. 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
21. 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
These terms and conditions are part of the Facility-wide Permit to Operate.

22. 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
23. 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
24. 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
25. Operator shall maintain records of average daily tank throughput. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1738-240-6

ISSUANCE DATE: 05/02/2012

LEGAL OWNER OR OPERATOR: VINTAGE PRODUCTION CALIFORNIA LLC

MAILING ADDRESS: 9600 MING AVE, SUITE 300
BAKERSFIELD, CA 93311

LOCATION: LIGHT OIL WESTERN STATIONARY SOURCE
WESTERN KERN COUNTY
KERN COUNTY, CA

SECTION: SW03 TOWNSHIP: 32S RANGE: 26E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 16,926 GALLON FIXED ROOF PETROLEUM STORAGE TANK #5335 WITH VAPOR RECOVERY SYSTEM INCLUDING 12 HP COMPRESSOR SERVING PERMITS S-1738-241 THROUGH '246 (PALOMA PROJECT); CONNECT UP TO FOUR (4) 500 BBL TANKS (S-1738-451 THROUGH '454) TO VAPOR CONTROL SYSTEM

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. 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
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, 3.11, 3.17, 3.18, and 6.4.8] 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 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

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-1738-240-6 : May 23 2012 9:47AM -- GOUGHD : Joint Inspection NOT Required

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

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. The tank shall be equipped with a vapor loss prevention system consisting of vapor and condensate collection systems capable of reducing VOC emissions by at least 99%. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Tank shall not be used to store or process liquids if the vapor control system is inoperable. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Vapor recovery system shall vent to gas plant (permit S-39-1) only. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Average tank throughput shall not exceed 25,200 gallons/day (calculated on a calendar quarter basis). [District NSR Rule] Federally Enforceable Through Title V Permit
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CONDITIONS CONTINUE ON NEXT PAGE

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
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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
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
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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
26. Operator shall maintain records of average daily tank throughput. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

APPENDIX B

PE Calculations

Light Oil Western Source - Paloma Facility
Project # , Permit Unit #: S-1738-240-5

Fugitive Emissions Using Screening Emission Factors

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

Percentage of components with $\geq 10,000$ ppmv leaks allowed? 0 %
Weight percentage of VOC in the total organic compounds in gas? 100 %
Weight percentage of VOC in the total organic compounds in oil? 100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value $< 10,000$ ppmv (lb/day/source)	Screening Value $\geq 10,000$ ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	22	0	1.852E-03	7.333E+00	0.04
	Light Crude Oil	32	0	1.005E-03	3.741E+00	0.03
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	2	0	5.270E-02	4.709E+00	0.11
	Light Crude Oil	2	0	1.402E-02	4.709E+00	0.03
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	26	0	7.778E-03	7.281E+00	0.20
	Light Crude Oil	27	0	6.931E-03	3.757E-01	0.19
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	24	0	6.349E-04	1.370E+00	0.02
	Light Crude Oil	31	0	5.291E-04	1.238E+00	0.02
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	22	0	1.482E-03	3.228E+00	0.03
	Light Crude Oil	17	0	1.270E-03	1.376E+01	0.02
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as $< 10,000$ ppmv

Total VOC Emissions = 0.68155 lb/day
- 0.09933
0.58222

Emission Calculation Worksheets

Light Oil Western Source - Paloma Facility

Project # , Permit Unit #: S-1738-240-5

(Just loading rack)

Fugitive Emissions Using Screening Emission Factors

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

Percentage of components with $\geq 10,000$ ppmv leaks allowed? 0 %
 Weight percentage of VOC in the total organic compounds in gas? 100 %
 Weight percentage of VOC in the total organic compounds in oil? 100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC		VOC emissions (lb/day)
				< 10,000 ppmv (lb/day/source)	$\geq 10,000$ ppmv (lb/day/source)	
Valves	Gas/Light Liquid	4	0	1.852E-03	7.333E+00	0.01
	Light Crude Oil	6	0	1.005E-03	3.741E+00	0.01
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	4	0	7.778E-03	7.281E+00	0.03
	Light Crude Oil	4	0	6.931E-03	3.757E-01	0.03
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	10	0	6.349E-04	1.370E+00	0.01
	Light Crude Oil	7	0	5.291E-04	1.238E+00	0.00
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	4	0	1.482E-03	3.228E+00	0.01
	Light Crude Oil	4	0	1.270E-03	1.376E+01	0.01
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.09333 lb/day

APPENDIX C

Health Risk Assessment Summary

San Joaquin Valley Air Pollution Control District Risk Management Review

To: Dolores Gough – Permit Services
 From: Cheryl Lawler – Technical Services
 Date: May 14, 2012
 Facility Name: Vintage Production California
 Location: Light Oil Western
 Application #(s): S-1738-240-7
 Project #: S-1120598

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A. RMR SUMMARY

RMR Summary			
Categories	Fugitive Emissions (Unit 240-7)	Project Totals	Facility Totals
Prioritization Score	0.00	0.00	>1
Acute Hazard Index	0.00	0.00	0.41
Chronic Hazard Index	0.00	0.00	0.06
Maximum Individual Cancer Risk	2.56E-09	2.56E-09	4.51E-06
T-BACT Required?	No		
Special Permit Conditions?	No		

I. Project Description

Technical Services received a request on April 26, 2012, to perform a Risk Management Review for the installation of a loading rack connected to a vapor control system and a crude oil fixed roof tank.

II. Analysis

Toxic emissions were calculated using emission factors for toxic fugitive emissions from oilfield equipment, along with VOC fugitive emission rates supplied by the processing engineer. In accordance with the District's *Risk Management Policy for Permitting New and Modified Sources* (APR 1905-1, March 2, 2001), risks from the project were prioritized using the procedures in the 1990 CAPCOA Facility Prioritization Guidelines and incorporated in the District's HEART's database. The prioritization score for the project was less than 1.0 (see RMR Summary Table); however, the facility's combined prioritization scores totaled to greater than one. Therefore, a refined Health Risk Assessment was required and performed for the project. AERMOD was used with area source parameters outlined below and concatenated 5-year meteorological data from Bakersfield to determine maximum dispersion factors at the nearest residential and business receptors. The dispersion factors were input into the HARP model to calculate the Chronic and Acute Hazard Indices and the Carcinogenic Risk.

The following parameters were used for the review:

Analysis Parameters			
Source Type	Area	Closest Receptor (m)	1219
Length of Sides (m)	6.1 x 15.24	Type of Receptor	Business
Release Height (m)	6.1	Location Type	Rural

III. Conclusions

The acute and chronic indices are below 1.0; and the maximum individual cancer risk associated with the project is **2.56E-09**, which is less than the 1 in a million threshold. In accordance with the District's Risk Management Policy, the project is approved **without** Toxic Best Available Control Technology (T-BACT).

These conclusions are based on the data provided by the applicant and the project engineer. Therefore, this analysis is valid only as long as the proposed data and parameters do not change.

APPENDIX D

Draft ATC

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1738-240-7

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

LOCATION: LIGHT OIL WESTERN STATIONARY SOURCE
WESTERN KERN COUNTY
KERN COUNTY, CA

SECTION: SW03 **TOWNSHIP:** 32S **RANGE:** 26E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 16,926 GALLON FIXED ROOF PETROLEUM STORAGE TANK #5335 WITH VAPOR RECOVERY SYSTEM INCLUDING 12 HP COMPRESSOR SERVING PERMITS S-1738-241 THROUGH '-246 AND FOUR (4) PORTABLE TANKS S-1738-451 THROUGH '-454 (PALOMA PROJECT): ADD ORGANIC LIQUID LOADING RACK, REMOVE THROUGHPUT AND TVP LIMITS, REMOVE REFERENCE TO "12 HP" COMPRESSOR IN EQUIPMENT DESCRIPTION, AND ALLOW VAPOR RECOVERY SYSTEM TO VENT TO GAS PLANT (S-39-1), FUEL SYSTEM, RE-INJECTION, OR FLARE (S-1738-347)

CONDITIONS

1. {1830} 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
2. {1831} 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
3. 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

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-1738-240-7 : May 23 2012 9:45AM -- GOUGHD : Joint Inspection NOT Required

4. 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, 3.11, 3.17, 3.18, and 6.4.8] Federally Enforceable Through Title V Permit
5. Any 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
6. {2606} 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
7. {2591} 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
8. 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
9. {2608} 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
10. The tank shall be equipped with a vapor loss prevention system consisting of vapor and condensate collection systems capable of reducing VOC emissions by at least 99%. [District District Rule 2201] Federally Enforceable Through Title V Permit
11. Tank shall not be used to store or process liquids if the vapor control system is inoperable. [District District Rule 2201] Federally Enforceable Through Title V Permit
12. Vapor recovery system shall vent to gas plant (permit S-39-1), fuel system, re-injection and/or to flare (S-1738-347). [District District Rule 2201] Federally Enforceable Through Title V Permit
13. Emissions from the loading rack shall not exceed 0.3 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Loading Rack fugitive component count shall not exceed 10 valves, 17 connectors, 8 flanges and 8 others. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Records of loading rack component count and total fugitive emissions, calculated using "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," shall be maintained, retained on the premises for a period of at least 5 years, and made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
16. Total number of disconnects during loading operations shall not exceed 12 per day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Emissions from the loading rack shall not exceed 0.08 lb per 1,000 gallons of organic liquid transferred. [District Rule 4624] Federally Enforceable Through Title V Permit
18. Pressure in the delivery tank being loaded shall not exceed 18 inches water column pressure. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
19. Drainage from loading rack disconnects shall not exceed 10 ml per disconnect. [District Rule 4624] Federally Enforceable Through Title V Permit
20. The loading rack shall be designed, installed, maintained and operated such that there are no leaks and no excess organic liquid drainage at disconnections. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

21. The loading rack vapor collection system shall be inspected during loading at least once every calendar quarter using a portable hydrocarbon analyzer in accordance with EPA Method 21. [District Rule 4624] Federally Enforceable Through Title V Permit
22. A leak in the loading rack's vapor collection system is the detection of any gaseous or vapor emissions with a concentration of VOC greater than 1,000 ppmv above background as methane when measured in accordance with ASTM Method D 287. [District Rule 4624] Federally Enforceable Through Title V Permit
23. All loading rack equipment that is 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 replacement equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
24. Records of every inspection for loading rack leaks, including the date and time of the inspection and the identification of every leaking component shall be maintained, retained on the premises for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
25. VOC emission rate shall not exceed 0.2 lb/hr and 0.8 lb/day. [District District Rule 2201] Federally Enforceable Through Title V Permit
26. 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
27. 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
28. 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
29. 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
30. 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
31. 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
32. 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

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CONDITIONS CONTINUE ON NEXT PAGE

33. 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
34. 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
35. 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
36. 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
37. ATC S-1738-240-6 shall be implemented before ~~or~~ concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit *or*

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APPENDIX E

Emissions Profile

Permit #: S-1738-240-7	Last Updated
Facility: VINTAGE PRODUCTION CALIFORNIA	05/21/2012 GOUGHD

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	424.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	1.1
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	31.0
Q2:	0.0	0.0	0.0	0.0	31.0
Q3:	0.0	0.0	0.0	0.0	31.0
Q4:	0.0	0.0	0.0	0.0	31.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

APPENDIX F

Title V Compliance Certification

San Joaquin Valley
Unified Air Pollution Control District

RECEIVED

FEB 29 2012

SJVAPCD
Southern Region

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

SIGNIFICANT PERMIT MODIFICATION

ADMINISTRATIVE

MINOR PERMIT MODIFICATION

AMENDMENT

COMPANY NAME: Vintage Production California LLC	FACILITY ID: - S - 1738
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: Denny Brown	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s) which the source is in compliance.
- Based on information and belief formed after reasonable inquiry, the source 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:

Denny Brown
Signature of Responsible Official

02-29-12
Date

Denny Brown
Name of Responsible Official (please print)

Operations Manager
Title of Responsible Official (please print)