



JUL 03 2012

Raymond Rodriguez  
Occidental of Elk Hills Inc  
10800 Stockdale Highway  
Bakersfield, CA 93311

**Re: Notice of Minor Title V Permit Modification  
District Facility # S-1216  
Project # 1121821**

Dear Mr. Rodriguez:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authorities to Construct (ATC) S-1216-160-0 through '-165-0 into the Title V operating permit. The ATCs authorize installation of a booster compressor station consisting of (3) 2000 hp screw and (2) 3000 hp reciprocating electrically-driven gas compressors and a glycol dehydration unit with 2.25 MMBtu/hr glycol reboiler with (3) 0.075 MMBtu/hr burners and vapor control and glycol contactor.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authorities to Construct (ATC) S-1216-160-0 through '-165-0, and application. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,



David Warner  
Director of Permit Services

Enclosures

**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

JUL 03 2012

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

Re: **Notice of Minor Title V Permit Modification**  
**District Facility # S-1216**  
**Project # 1121821**

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Occidental of Elk Hills Inc is proposing a Title V minor permit modification to incorporate the recently issued Authorities to Construct (ATC) S-1216-160-0 through '-165-0 into the Title V operating permit. The ATCs authorize installation of a booster compressor station consisting of (3) 2000 hp screw and (2) 3000 hp reciprocating electrically-driven gas compressors and a glycol dehydration unit with 2.25 MMBtu/hr glycol reboiler with (3) 0.075 MMBtu/hr burners and vapor control and glycol contactor.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authorities to Construct (ATC) S-1216-160-0 through '-165-0, and application. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,



David Warner  
Director of Permit Services

Enclosures

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585

# TITLE V APPLICATION REVIEW

Minor Modification  
Project #: S-112821

Engineer: Richard Edgehill  
Date: June 27, 2012

Facility Number: S-1216  
Facility Name: Occidental of Elk Hills Inc  
Mailing Address: 10800 Stockdale Hwy  
Bakersfield, CA 93311

RWK  
6-28-12

Contact Name: Raymond Rodriguez  
Phone: (661) 412-5263  
Title: Sr. Environmental Advisor  
Responsible Official: Armando Gonzalez, Manager Environment Safety, and Security  
Lead Engineer: Richard Karrs

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## I. PROPOSAL

Occidental of Elk Hills Inc (OEHI) is proposing a Title V minor permit modification to incorporate the recently issued Authorities to Construct (ATC) S-1216-160-0 through -165-0. The ATCs authorize installation of a booster compressor station consisting of (3) 2000 hp screw and (2) 3000 hp reciprocating electrically-driven gas compressors and a glycol dehydration unit with 2.25 MMBtu/hr glycol reboiler with (3) 0.075 MMBtu/hr burners and vapor control and glycol contactor.

## II. FACILITY LOCATION

The new equipment will be located at NW Section 1, T32S, R23E at OEHI's light oil production stationary source in the western Kern County fields.

## III. EQUIPMENT DESCRIPTION

**S-1216-160-1:** 2000 HP ELECTRICALLY DRIVEN GAS COMPRESSOR (K-125)

**S1216-161-1:** 2000 HP ELECTRICALLY DRIVEN GAS COMPRESSOR (K-126)

**S-1216-162-1:** 2000 HP ELECTRICALLY DRIVEN GAS COMPRESSOR (K-127)

**S-1216-163-1: 3000 HP ELECTRICALLY DRIVEN GAS COMPRESSOR (K-128)**

**S-1216-164-1: 3000 HP ELECTRICALLY DRIVEN GAS COMPRESSOR (K-129)**

**S-1216-165-1: GLYCOL DEHYDRATION SYSTEM WITH INLET FILTERS (F-803 THROUGH F-805), VARIOUS PUMPS AND BLOWERS, SURGE TANK AND EXCHANGER (T-806), GLYCOL ABSORBER WITH SCRUBBER (V-801), FLASH SEPARATOR (V-802), GLYCOL/GLYCOL EXCHANGER (E-807), STILL COLUMN (SC-808), AND 2.25 MM BTU/HR NATURAL GAS-FIRED GLYCOL REBOILER (H-809) WITH VAPORS SENT TO BTEX CONDENSER (E-831), BTEX ACCUMULATOR (V-831), AND S-1216 VACUUM SYSTEM**

#### **IV. SCOPE OF EPA AND PUBLIC REVIEW**

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

#### **V. APPLICABLE REQUIREMENTS**

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

#### **VI. DESCRIPTION OF PROPOSED MODIFICATIONS**

S-1216-160-1 through '-165-1

Draft PTOs S-1216-160-1 through '-165-1 authorize new permit units and include all of the conditions listed on ATCs S-2234-160-0 through '-165-0. Note that the ATCs were issued (March 31, 2011) before the source received their initial Title V permit (January 12, 2012). Therefore the ATCs did not include a requirement for submittal of a Title V Minor Modification application.

#### **VII. COMPLIANCE**

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.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including:

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

## **VIII. ATTACHMENTS**

- A. Proposed Title V Operating Permits
- B. Authorityies to Construct
- C. Application

Attachment A  
Proposed Title V Operating Permits

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1216-160-1

**EXPIRATION DATE:** 08/31/2016

**SECTION:** NW1 **TOWNSHIP:** 32S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

2000 HP ELECTRICALLY DRIVEN GAS COMPRESSOR (K-125)

## PERMIT UNIT REQUIREMENTS

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1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
2. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. To verify compliance with the VOC emissions limit, permittee shall maintain an accurate count and estimate of emissions for the added components in gas/light liquid and light crude oil service, in accordance with CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. [District Rule 2201] Federally Enforceable Through Title V Permit
6. VOC fugitive emissions from slug catcher V-201 shall not exceed 0.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. VOC fugitive emissions from compressor and associated piping shall not exceed 0.4 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall be maintained leak-free. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
9. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1216-161-1

**EXPIRATION DATE:** 08/31/2016

**SECTION:** NW1 **TOWNSHIP:** 32S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

2000 HP ELECTRICALLY DRIVEN GAS COMPRESSOR (K-126)

## PERMIT UNIT REQUIREMENTS

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1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
2. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. To verify compliance with the VOC emissions limit, permittee shall maintain an accurate count and estimate of emissions for the added components in gas/light liquid and light crude oil service, in accordance with CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. [District Rule 2201] Federally Enforceable Through Title V Permit
6. VOC fugitive emissions from compressor and associated piping shall not exceed 0.4 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. This unit shall be maintained leak-free. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
8. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1216-162-1

**EXPIRATION DATE:** 08/31/2016

**SECTION:** NW1 **TOWNSHIP:** 32S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

2000 HP ELECTRICALLY DRIVEN GAS COMPRESSOR (K-127)

## PERMIT UNIT REQUIREMENTS

---

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
2. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. To verify compliance with the VOC emissions limit, permittee shall maintain an accurate count and estimate of emissions for the added components in gas/light liquid and light crude oil service, in accordance with CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. [District Rule 2201] Federally Enforceable Through Title V Permit
6. VOC fugitive emissions from compressor and associated piping shall not exceed 0.4 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. This unit shall be maintained leak-free. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
8. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1216-163-1

**EXPIRATION DATE:** 08/31/2016

**SECTION:** NW1 **TOWNSHIP:** 32S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

3000 HP ELECTRICALLY DRIVEN GAS COMPRESSOR (K-128)

## PERMIT UNIT REQUIREMENTS

---

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
2. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. To verify compliance with the VOC emissions limit, permittee shall maintain an accurate count and estimate of emissions for the added components in gas/light liquid and light crude oil service, in accordance with CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. [District Rule 2201] Federally Enforceable Through Title V Permit
6. VOC emissions from aftercooler scrubber V-301 shall not exceed 0.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. VOC fugitive emissions from compressor and associated piping shall not exceed 0.4 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall be maintained leak-free. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
9. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1216-164-1

**EXPIRATION DATE:** 08/31/2016

**SECTION:** NW1 **TOWNSHIP:** 32S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

3000 HP ELECTRICALLY DRIVEN GAS COMPRESSOR (K-129)

## PERMIT UNIT REQUIREMENTS

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1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
2. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. To verify compliance with the VOC emissions limit, permittee shall maintain an accurate count and estimate of emissions for the added components in gas/light liquid and light crude oil service, in accordance with CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. [District Rule 2201] Federally Enforceable Through Title V Permit
6. VOC fugitive emissions from compressor and associated piping shall not exceed 0.4 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. This unit shall be maintained leak-free. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
8. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1216-165-1

**EXPIRATION DATE:** 08/31/2016

**SECTION:** NW1 **TOWNSHIP:** 32S **RANGE:** 23E

## **EQUIPMENT DESCRIPTION:**

GLYCOL DEHYDRATION SYSTEM WITH INLET FILTERS (F-803 THROUGH F-805), VARIOUS PUMPS AND BLOWERS, SURGE TANK AND EXCHANGER (T-806), GLYCOL ABSORBER WITH SCRUBBER (V-801), FLASH SEPARATOR (V-802), GLYCOL/GLYCOL EXCHANGER (E-807), STILL COLUMN (SC-808), AND 2.25 MM BTU/HR NATURAL GAS-FIRED GLYCOL REBOILER (H-809) WITH VAPORS SENT TO BTEX CONDENSER (E-831), BTEX ACCUMULATOR (V-831), AND S-1216 VACUUM SYSTEM

## **PERMIT UNIT REQUIREMENTS**

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
2. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. To verify compliance with the VOC emissions limit, permittee shall maintain an accurate count and estimate of emissions for the added components in gas/light liquid and light crude oil service, in accordance with CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. [District Rule 2201] Federally Enforceable Through Title V Permit
6. VOC fugitive emissions from glycol reboiler (H-809) and associated piping shall not exceed 0.4 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. VOC fugitive emissions from glycol absorber with scrubber (V-801) and associated piping shall not exceed 0.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Gas combusted by glycol reboiler shall contain less than 5% by weight hydrocarbons heavier than butane and less than 1.0 gr S/100scf. [District Rule 2020] Federally Enforceable Through Title V Permit
9. Glycol reboiler vent emissions shall be ducted to BTEX condenser (E-830) followed by BTEX accumulator (V-831). [District Rule 2201] Federally Enforceable Through Title V Permit
10. Condensate handling shall be conducted in closed systems resulting in fugitive component emissions only and no evaporation of VOCs. [District Rules 2201 and 4408] Federally Enforceable Through Title V Permit
11. BTEX accumulator (V-831) off gas shall not be vented to atmosphere, except during an emergency or breakdown. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Only glycol shall be used as the dehydration medium. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. This unit shall be maintained leak-free. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Records of the amount of gas (in SCF) dehydrated each day and each month shall be maintained, retained on the premises for a period of not less than five years and made available to any District representative upon request. [District Rules 1070, 2201, and 4408] Federally Enforceable Through Title V Permit
15. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

DRAFT

**Attachment B**  
**Authorities to Construct**

# AUTHORITY TO CONSTRUCT

PERMIT NO: S-1216-160-0

ISSUANCE DATE: 03/31/2011

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS INC

MAILING ADDRESS: 10800 STOCKDALE HIGHWAY  
BAKERSFIELD, CA 93311

LOCATION: LIGHT OIL WESTERN

SECTION: NW1 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

2000 HP ELECTRICALLY DRIVEN GAS COMPRESSOR (K-125)

## CONDITIONS

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1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. To verify compliance with the VOC emissions limit, permittee shall maintain an accurate count and estimate of emissions for the added components in gas/light liquid and light crude oil service, in accordance with CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. [District Rule 2201]
6. VOC fugitive emissions from slug catcher V-201 shall not exceed 0.2 lb/day. [District Rule 2201]
7. VOC fugitive emissions from compressor and associated piping shall not exceed 0.4 lb/day. [District Rule 2201]

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

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DAVID WARNER, Director of Permit Services

S-1216-160-0 : Jun 27 2012 8:14AM - EDGEHILL : Joint Inspection NOT Required

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

8. This unit shall be maintained leak-free. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201]
9. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

# AUTHORITY TO CONSTRUCT

PERMIT NO: S-1216-161-0

ISSUANCE DATE: 03/31/2011

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS INC  
MAILING ADDRESS: 10800 STOCKDALE HIGHWAY  
BAKERSFIELD, CA 93311

LOCATION: LIGHT OIL WESTERN

SECTION: NW1 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:  
2000 HP ELECTRICALLY DRIVEN GAS COMPRESSOR (K-126)

## CONDITIONS

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1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. To verify compliance with the VOC emissions limit, permittee shall maintain an accurate count and estimate of emissions for the added components in gas/light liquid and light crude oil service, in accordance with CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. [District Rule 2201]
6. VOC fugitive emissions from compressor and associated piping shall not exceed 0.4 lb/day. [District Rule 2201]
7. This unit shall be maintained leak-free. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201]

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

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DAVID WARNER, Director of Permit Services

S-1216-161-0 : Jun 27 2012 8:14AM - EDGEHILL : Joint Inspection NOT Required

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

8. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

# AUTHORITY TO CONSTRUCT

PERMIT NO: S-1216-162-0

ISSUANCE DATE: 03/31/2011

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS INC  
MAILING ADDRESS: 10800 STOCKDALE HIGHWAY  
BAKERSFIELD, CA 93311

LOCATION: LIGHT OIL WESTERN

SECTION: NW1 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:  
2000 HP ELECTRICALLY DRIVEN GAS COMPRESSOR (K-127)

## CONDITIONS

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1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. To verify compliance with the VOC emissions limit, permittee shall maintain an accurate count and estimate of emissions for the added components in gas/light liquid and light crude oil service, in accordance with CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. [District Rule 2201]
6. VOC fugitive emissions from compressor and associated piping shall not exceed 0.4 lb/day. [District Rule 2201]
7. This unit shall be maintained leak-free. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

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DAVID WARNER, Director of Permit Services  
S-1216-162-0 : Jun 27 2012 8:14AM -- EDGEHILL : Joint Inspection NOT Required

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

8. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

# AUTHORITY TO CONSTRUCT

PERMIT NO: S-1216-163-0

ISSUANCE DATE: 03/31/2011

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS INC  
MAILING ADDRESS: 10800 STOCKDALE HIGHWAY  
BAKERSFIELD, CA 93311

LOCATION: LIGHT OIL WESTERN

SECTION: NW1 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:  
3000 HP ELECTRICALLY DRIVEN GAS COMPRESSOR (K-128)

## CONDITIONS

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1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. To verify compliance with the VOC emissions limit, permittee shall maintain an accurate count and estimate of emissions for the added components in gas/light liquid and light crude oil service, in accordance with CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. [District Rule 2201] Federally Enforceable Through Title V Permit
6. VOC emissions from aftercooler scrubber V-301 shall not exceed 0.2 lb/day. [District Rule 2201]
7. VOC fugitive emissions from compressor and associated piping shall not exceed 0.4 lb/day. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

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DAVID WARNER, Director of Permit Services  
S-1216-163-0 : Jun 27 2012 8:15AM -- EDGEHILR : Joint Inspection NOT Required

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

8. This unit shall be maintained leak-free. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201]
9. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

# AUTHORITY TO CONSTRUCT

PERMIT NO: S-1216-164-0

ISSUANCE DATE: 03/31/2011

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS INC  
MAILING ADDRESS: 10800 STOCKDALE HIGHWAY  
BAKERSFIELD, CA 93311

LOCATION: LIGHT OIL WESTERN

SECTION: NW1 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:  
3000 HP ELECTRICALLY DRIVEN GAS COMPRESSOR (K-129)

## CONDITIONS

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1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. To verify compliance with the VOC emissions limit, permittee shall maintain an accurate count and estimate of emissions for the added components in gas/light liquid and light crude oil service, in accordance with CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. [District Rule 2201]
6. VOC fugitive emissions from compressor and associated piping shall not exceed 0.4 lb/day. [District Rule 2201]
7. This unit shall be maintained leak-free. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

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DAVID WARNER, Director of Permit Services

S-1216-164-0 : Jun 27 2012 8:15AM -- EDGEHILL : Joint Inspection NOT Required

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8. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: 03/31/2011  
**DRAFT**

**PERMIT NO:** S-1216-165-0

**LEGAL OWNER OR OPERATOR:** OCCIDENTAL OF ELK HILLS INC  
**MAILING ADDRESS:** 10800 STOCKDALE HIGHWAY  
BAKERSFIELD, CA 93311

**LOCATION:** LIGHT OIL WESTERN

**SECTION:** NW1 **TOWNSHIP:** 32S **RANGE:** 23E

**EQUIPMENT DESCRIPTION:**

GLYCOL DEHYDRATION SYSTEM WITH INLET FILTERS (F-803 THROUGH F-805), VARIOUS PUMPS AND BLOWERS, SURGE TANK AND EXCHANGER (T-806), GLYCOL ABSORBER WITH SCRUBBER (V-801), FLASH SEPARATOR (V-802), GLYCOL/GLYCOL EXCHANGER (E-807), STILL COLUMN (SC-808), AND 2.25 MM BTU/HR NATURAL GAS-FIRED GLYCOL REBOILER (H-809) WITH VAPORS SENT TO BTEX CONDENSER (E-831), BTEX ACCUMULATOR (V-831), AND S-1216 VACUUM SYSTEM

**CONDITIONS**

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
2. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. To verify compliance with the VOC emissions limit, permittee shall maintain an accurate count and estimate of emissions for the added components in gas/light liquid and light crude oil service, in accordance with CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. [District Rule 2201]
6. VOC fugitive emissions from glycol reboiler (H-809) and associated piping shall not exceed 0.4 lb/day. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director, APCO

**DAVID WARNER, Director of Permit Services**

S-1216-165-0 : Jun 27 2012 8:39AM - EDGEHILR : Joint Inspection NOT Required

7. VOC fugitive emissions from glycol absorber with scrubber (V-801) and associated piping shall not exceed 0.2 lb/day. [District Rule 2201]
8. Gas combusted by glycol reboiler shall contain less than 5% by weight hydrocarbons heavier than butane and less than 1.0 gr S/100scf. [District Rule 2020]
9. Glycol reboiler vent emissions shall be ducted to BTEX condenser (E-830) followed by BTEX accumulator (V-831). [District Rule 2201]
10. Condensate handling shall be conducted in closed systems resulting in fugitive component emissions only and no evaporation of VOCs. [District Rules 2201 and 4408]
11. BTEX accumulator (V-831) off gas shall not be vented to atmosphere, except during an emergency or breakdown. [District Rule 2201]
12. Only glycol shall be used as the dehydration medium. [District Rule 2201]
13. This unit shall be maintained leak-free. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. [District Rule 2201]
14. Records of the amount of gas (in SCF) dehydrated each day and each month shall be maintained, retained on the premises for a period of not less than five years and made available to any District representative upon request. [District Rules 1070, 2201, and 4408]
15. {3246} All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

DRAFT

# Attachment C Application

S-1216-160-1 through S-165-1

RECEIVED  
MAY 30 2012

San Joaquin Valley Air Pollution Control District SJVAPCD  
Southern Region  
[www.valleyair.org](http://www.valleyair.org)

Permit Application For:

ADMINISTRATIVE AMENDMENT     MINOR MODIFICATION     SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Occidental of Elk Hills, Inc	
2. MAILING ADDRESS: STREET/P.O. BOX: 10800 Stockdale Hwy CITY: Bakersfield STATE: CA 9-DIGIT ZIP CODE: 93311	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: Elk Hills CITY: Tupman ¼ SECTION TOWNSHIP RANGE	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: Oil and Natural Gas Production	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)  Incorporate the following ATCs into S-1216 Title V Permit: S-1216-160-0 S-1216-161-0 S-1216-162-0 S-1216-163-0 S-1216-164-0 S-1216-165-0	
6. TYPE OR PRINT NAME OF APPLICANT: Raymond Rodriguez	TITLE OF APPLICANT: Sr. Environmental Advisor
7. SIGNATURE OF APPLICANT: 	DATE: 5/29/2012 PHONE: (661) 412-5263 FAX: (661) 412-5270 EMAIL: Raymond_rodriguez@oxy.com

For APCD Use Only:

Vector Envir

DATE STAMP	FILING FEE RECEIVED: \$ 426.00	CHECK#: 9773
	DATE PAID: Pm 5:30-12	
	PROJECT NO: S-1121821	FACILITY ID: S-1216

Title V - Minor Mod

San Joaquin Valley  
Unified Air Pollution Control District

RECEIVED  
MAY 30 2012  
SJVAPCD  
Southern Region

**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM**

**I. TYPE OF PERMIT ACTION (Check appropriate box)**

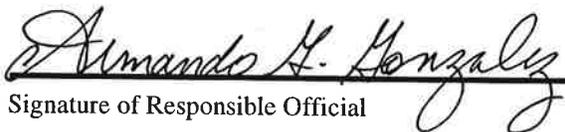
- SIGNIFICANT PERMIT MODIFICATION                       ADMINISTRATIVE AMENDMENT  
 MINOR PERMIT MODIFICATION

COMPANY NAME: Occidental of Elk Hills, Inc	FACILITY ID: S - 1216
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: Occidental of Elk Hills, Inc	
3. Agent to the Owner: Occidental of Elk Hills, Inc.	

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

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

  
Signature of Responsible Official

5/29/2012  
Date

Armando Gonzalez

Name of Responsible Official (please print)

Health, Environmental, Safety & Security Manager

Title of Responsible Official (please print)