

Santa Barbara County
Air Pollution Control District

SEP 02 2010

Mr. Gerardo Rios
USEPA – Permits Office (AIR 3)
75 Hawthorne Street
San Francisco, CA 94105

FID: 00028
Permit: PM 7904-04
SSID: 01063

Re: Proposed Minor Permit Modifications to Venoco Inc.'s Ellwood Onshore Facility Part 70/APCD PTO 7904-R8

Dear Mr. Rios:

This letter transmits Proposed Minor Permit Modification Permit to Operate (PTO) 7904 04 for modifications to Part 70/APCD PTO 7904-R8. Included with the proposed permit is a copy of the application submitted by the applicant for this modification. We plan to issue this minor permit modification as final after October 25, 2010 provided your office has not objected to such issuance during this time interval.

If you have any questions, please contact Ben Ellenberger of my staff at (805) 961-8879.

Sincerely,



Michael Goldman, Manager
Engineering & Compliance Division

enc: Proposed PTO Mod 7904 04
Application forms for Minor Modifications to Venoco's Ellwood Onshore Facility

cc: Ellwood Onshore Facility 00028 Project File SC
ECD Chron File



APCD Permit to Operate Mod 7904 04
Part 70 Minor Modification Permit 7904 04

Page 1 of 7

EQUIPMENT OWNER:

Venoco, Inc.

390850

EQUIPMENT OPERATOR:

Venoco, Inc.

EQUIPMENT LOCATION:

7979 Hollister Avenue, Goleta

STATIONARY SOURCE/FACILITY:

Venoco - Ellwood
Ellwood Onshore Facility

SSID: 01063
FID: 00028

AUTHORIZED MODIFICATION:

This Permit to Operate Modification (PTO Mod) authorizes the relocation of the ambient air monitoring station for the Ellwood Onshore Facility from the Goleta Storage Facility to the north end of Armas Road, Goleta CA. The station is being relocated because Venoco's lease at the current location is ending. The new location is approximately 1,000 feet west of the current location.

EQUIPMENT DESCRIPTION:

The equipment subject to this permit is listed in the table at the end of this permit.

PROJECT/PROCESS DESCRIPTION:

See Reeval 7904-R8 for a detailed description of the processes at the facility.

CONDITIONS:

9.A Standard Administrative Conditions

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

A.1 Compliance with Permit Conditions.

- (a) The permittee shall comply with all permit conditions in Sections 9.A, 9.B and 9.C.
- (b) This permit does not convey property rights or exclusive privilege of any sort.
- (c) Any permit noncompliance with sections 9.A, 9.B, or 9.C constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.
- (d) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (e) A pending permit action or notification of anticipated noncompliance does not stay any permit condition.
- (f) Within a reasonable time period, the permittee shall furnish any information requested by the Control Officer, in writing, for the purpose of determining:
 - (i) compliance with the permit, or
 - (ii) whether or not cause exists to modify, revoke and reissue, or terminate a permit or for an enforcement action.
- (g) In the event that any condition herein is determined to be in conflict with any other condition contained herein, then, if principles of law do not provide to the contrary, the condition most protective of air quality and public health and safety shall prevail to the extent feasible.

[Re: 40 CFR Part 70.6.(a)(6), APCD Rules 1303.D.1]

- A.2 Emergency Provisions.** The permittee shall comply with the requirements of the APCD, Rule 505 (Upset/Breakdown rule) and/or APCD Rule 1303.F, whichever is applicable to the emergency situation. In order to maintain an affirmative defense under Rule 1303.F, the permittee shall provide the APCD, in writing, a “notice of emergency” within 2 working days of the emergency. The “notice of emergency” shall contain the information/documentation listed in Sections (1) through (5) of Rule 1303.F.9 [Re: 40 CFR 70.6(g), APCD Rule 1303.F]

A.3 Compliance Plan.

- (a) The permittee shall comply with all federally-enforceable requirements that become applicable during the permit term in a timely manner.
- (b) For all applicable equipment, the permittee shall implement and comply with any specific compliance plan required under any federally-enforceable rules or standards.

[Re: APCD Rule 1302.D.2]

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

- (a) To inspect the stationary source, including monitoring and control equipment, work practices, operations, and emission-related activity;
 - (b) To inspect and duplicate, at reasonable times, records required by this Permit to Operate;
 - (c) To sample substances or monitor emissions from the source or assess other parameters to assure compliance with the permit or applicable requirements, at reasonable times.
- Monitoring of emissions can include source testing.

[Re: *APCD Rule 1303.D.2*]

- A.5 **Severability.** The provisions of this Permit to Operate are severable and if any provision of this Permit to Operate is held invalid, the remainder of this Permit to Operate shall not be affected thereby. [Re: *APCD Rules 103 and 1303.D.1*]
- A.6 **Payment of Fees.** The permittee shall reimburse the APCD for all its Part 70 permit processing and compliance expenses, including expenses associated with implementation of permit conditions incorporated pursuant to Abatement Order 99-6A, for the stationary source on a timely basis. Failure to reimburse on a timely basis shall be a violation of this permit and of applicable requirements and can result in forfeiture of the Part 70 permit. Operation without a Part 70 permit subjects the source to potential enforcement action by the APCD and the USEPA pursuant to section 502(a) of the Clean Air Act. [Re: *APCD Rules 1303.D.1 and 1304.D.11, 40 CFR 70.6(a)(7), AO 99-6A*]
- A.7 **Deviation from Permit Requirements.** The permittee shall submit a written report to the APCD documenting each and every deviation from the requirements of this permit or any applicable federal requirements within 7 days after discovery of the violation, but not later than 180 days after the date of occurrence. The report shall clearly document 1) the probable cause and extent of the deviation 2) equipment involved 3) the quantity of excess pollutant emissions if any, and 4) actions taken to correct the deviation. The requirements of this condition shall not apply to deviations reported to APCD in accordance with Rule 505. *Breakdown Conditions*, or Rule 1303.F *Emergency Provisions*. [Re: *APCD Rule 1303.D.1, 40 CFR 70.6(a) (3)*]
- A.8 **Federally-enforceable Conditions.** Each federally-enforceable condition in this permit shall be enforceable by the USEPA and members of the public. None of the conditions in the APCD-only enforceable section of this permit are federally enforceable or subject to the public/USEPA review. [Re: *CAAA, § 502(b)(6), 40 CFR 70.6(b)*]
- A.9 **Reporting Requirements/Compliance Certification.** The permittee shall submit compliance certification reports to the USEPA and the Control Officer every six months. These reports shall be submitted on APCD forms and shall identify each applicable requirement/condition of the permit, the compliance status with each requirement/condition, the monitoring methods used to determine compliance, whether the compliance was continuous or intermittent, and include detailed information on the occurrence and correction of any deviations (excluding emergency upsets) from permit requirement. The reporting periods shall be each half of the calendar year, e.g., January through June for the first half of the year. These reports shall be submitted by September 1 and March 1, respectively, each year. Supporting monitoring data shall be submitted in accordance with the "Semi-Annual Compliance Verification Report" condition in section 9.C. The permittee shall include a written statement from the responsible official, which certifies the truth, accuracy, and completeness of the reports. [Re: *APCD Rules 1303.D.1, 1302.D.3, 1303.2.c*]

A.10 **Recordkeeping Requirements.** The permittee shall maintain records of required monitoring information that include the following:

- (a) The date, place as defined in the permit, and time of sampling or measurements;
- (b) The date(s) analyses were performed;
- (c) The company or entity that performed the analyses;
- (d) The analytical techniques or methods used;
- (e) The results of such analyses; and
- (f) The operating conditions as existing at the time of sampling or measurement;

The records, as well as all supporting information including calibration and maintenance records, shall be maintained for a minimum of five (5) years from date of initial entry by the permittee and shall be made available to the APCD upon request.

[Re: APCD Rule 1303.D.1.f, 40 CFR 70.6(a)(3)(ii)(A)]

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

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

Administrative procedures to reopen a permit shall follow the same procedures as apply to initial permit issuance. Re-openings shall affect only those parts of the permit for which causes to reopen exist. If the permit is reopened, and revised, it will be reissued with the expiration date that was listed in the permit before the re-opening. [Re: 40 CFR 70.7(f), 40 CFR 70.6(a)]

9.B Generic Conditions

The generic conditions listed below apply to all emission units, regardless of their category or emission rates. These conditions are federally enforceable. Compliance with these requirements is discussed in Section 3. In case of a discrepancy between the wording of a condition and the applicable federal or APCD rule(s), the wording of the rule shall control.

- B.1 **Circumvention (Rule 301).** A person shall not build, erect, install, or use any article, machine, equipment or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Division 26 (Air Resources) of the Health and Safety Code of the State of California or of these Rules and Regulations. This Rule shall not apply to cases in which the only violation involved is of Section 41700 of the Health and Safety Code of the State of California, or of APCD Rule 303. [*Re: APCD Rule 301*]
- B.2 **Visible Emissions (Rule 302):** Venoco shall not discharge into the atmosphere from any single source of emission any air contaminants for a period or periods aggregating more than three minutes in any one hour which is:
- (a) As dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or
 - (b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection B.2.(a) above.

Venoco shall determine compliance with the requirements of this Rule in accordance with the monitoring and compliance recordkeeping procedures in Condition 9.C.25. [*Re: APCD Rule 302*].

- B.3 **Nuisance (Rule 303).** No pollutant emissions from any source at Venoco shall create nuisance conditions. No operations shall endanger health, safety or comfort, nor shall they damage any property or business. [*Re: APCD Rule 303*]

9.C Equipment-Specific Conditions

Federally enforceable conditions, including emissions and operations limits, monitoring, recordkeeping and reporting are included in this section for each specific group of equipment as well as other non-generic requirements.

The condition below replaces conditions C.17 in PTO 7904-R8. All other conditions in PTO 7904-R8 remain in full force and effect.

C.17 **Ambient Air Monitoring Stations.** Venoco shall install and maintain two ambient air monitoring stations, approved by the APCD, located as described below to monitor meteorological and odorous organic sulfide concentrations in the vicinity of the Ellwood Onshore Facility ("EOF"). The monitoring stations shall be equipped to continuously monitor and telemeter the data identified in Tables 9-6 and 9-7 below to the APCD in a manner consistent with the APCD's *Ambient Air Monitoring Protocol*. Venoco shall connect all ambient and meteorological parameters to the APCD's central *Data Acquisition System (DAS)* as documented in Tables 9-6 and 9-7 below.

Table 9-6 EOF-Located 10-Meter Meteorological Tower

Ambient Air Monitoring Station	Required Parameters
Ellwood Onshore Oil & Gas Processing Facility 7979 Hollister Avenue Goleta, CA 93117	<ul style="list-style-type: none"> ▪ Wind Speed Average ▪ Wind Direction Average ▪ Wind Speed Resultant ▪ Wind Direction Resultant ▪ Sigma Theta (Wind Variation) ▪ Ambient Temperature

Table 9-7 Las Armas Road-Located 10-Meter Meteorological Tower and Odor Monitoring Station

Ambient Air Monitoring Station	Required Parameters
150 Feet from the End of Las Armas Road Goleta, CA 93117 (location of station approved by APCD)	<ul style="list-style-type: none"> ▪ Hydrogen Sulfide ▪ Total Reduced Sulfur ▪ Horizontal Wind Speed ▪ Horizontal Wind Direction ▪ Vector Wind Speed ▪ Vector Wind Direction ▪ Sigma Theta (Wind Variation) ▪ Ambient Temperature

Venoco shall reimburse the APCD's costs for the review and audit of the stations' data in accordance with the cost reimbursement provisions of APCD Rule 210 and Condition 9.C.18, Table 9-9. [Re: *ATC/PTO Mod 7904-02, Abatement Order 99-6(A)*].

D. APCD-Only Conditions

The following section lists permit conditions that are not enforceable by the USEPA or the public. However, these conditions are enforceable by the APCD and the State of California. These conditions are issued pursuant to APCD Rule 206 (*Conditional Approval of Authority to Construct or Permit to Operate*)

- D.1 **Permit Activation.** All aspects of this permit are enforceable by the APCD and the State of California upon the issuance date stamped below. The Part 70 aspects of this permit are not final until:
- (a) The USEPA has provided written comments to the APCD and these comments require no modification to this permit. The APCD will issue a letter stating that this permit is a final Part 70 permit. The effective date that this permit will be considered a final Part 70 permit will be the date stamped on the APCD's letter.
 - (b) After the USEPA has provided the APCD written comments that require a modification to this permit, the APCD will modify this permit to address the USEPA's comments and issue the Part 70 permit as final. The re-issued permit will supersede this permit in its entirety.
- D.2 **Grounds for Revocation.** Failure to abide by and faithfully comply with this permit or any Rule, Order, or Regulation may constitute grounds for revocation pursuant to California Health & Safety Code Section 42307 et seq.



AIR POLLUTION CONTROL OFFICER

SEP 02 2010

DATE

Attachments:

- Permit Evaluation for Permit to Operate Mod 7904 04

Notes:

- Reevaluation Due Date: December 22, 2011
- Stationary sources are subject to an annual emission fee (see Fee Schedule B-3 of Rule 210).
- Annual reports are due by March 1st of each year.



**PERMIT EVALUATION FOR
PERMIT TO OPERATE MOD 7904 04**

Page 1 of 3

1.0 BACKGROUND

1.1 General: Venoco is required to install and operate H₂S and total reduced sulfur (TRS) ambient monitors by PTO 7904 R8 and by Abatement Order 99-6(A) 11.(h)(iii). One monitor must be located at the Ellwood Onshore Facility and one monitor must be located in a downwind neighborhood. Venoco's lease is expiring for the monitor which is currently located in a downwind neighborhood, so Venoco has identified a new location for the monitor. The APCD has reviewed the proposed new location and concurred that it is appropriate.

1.2 Permit History:

PERMIT	FINAL ISSUED	PERMIT DESCRIPTION
PT-70/Reeval 07904 R8	12/29/2008	Combined APCD Reevaluation and PT-70 Renewal.
PTO Mod 07904 03	10/22/2009	Increase the permitted inlet CO ₂ concentration and decrease the permitted flaring rate.
ATC 13420	05/11/2010	Replace the burner on H-205.

1.3 Compliance History:

VIOLATION TYPE	NUMBER	ISSUE DATE	DESCRIPTION OF VIOLATION
NOV	9265	06/19/2009	Failure to repair eight fugitive ROC leaks within the allotted time periods.
NOV	9417	07/16/2009	Exceeding the permitted Benzene DRE requirement of 98.5%.
NOV	9422	10/15/2009	Unplanned flaring.
NOV	9595	03/03/2010	Failing to control emissions of produced gas from T-202.

2.0 ENGINEERING ANALYSIS

2.1 Equipment/Processes: A complete process description of the EOF operations may be found in the Part 70/APCD Permit to Operate 7904-R8 as well as in the APCD's administrative files.

2.2 Emission Controls: A detailed review of emission controls for all emission units at EOF is provided at the Part 70/APCD PTO 7904-R8.

2.3 Emission Factors: The monitoring station is not an emission unit.

- 2.4 Reasonable Worst Case Emission Scenario: The monitoring station is not an emission unit.
- 2.5 Emission Calculations: The monitoring station is not an emission unit.
- 2.6 Special Calculations: No special calculations are required.
- 2.7 BACT Analyses: Best Available Control Technology was not required for this project.
- 2.8 Enforceable Operational Limits: The permit has enforceable operating conditions that ensure the equipment is operated properly.
- 2.9 Monitoring Requirements: This permit requires monitoring of the parameters required by APCD *Ambient Air Monitoring Protocol*.
- 2.10 Recordkeeping and Reporting Requirements: The permit requires that the data which is monitored be recorded and reported to the APCD.

3.0 REEVALUATION REVIEW (not applicable)

4.0 REGULATORY REVIEW

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

- Rule 101. Compliance of Existing Facilities
- Rule 201. Permits Required
- Rule 202. Exemptions to Rule 201
- Rule 205. Standards for Granting Permits
- Rule 302. Visible Emissions
- Rule 303. Nuisance
- Rule 505. Breakdown Procedures
- Rule 801. New Source Review
- Rule 802. Nonattainment Review
- Rule 803. Prevention of Significant Deterioration

- 4.2 Rules Requiring Review: None

- 4.3 NEI Calculations: The net emission increase calculation is used to determine whether certain requirements must be applied to a project (e.g., offsets, AQIA, PSD BACT). The daily NEI for the facility is not affected by this project.

5.0 AQIA

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

6.0 OFFSETS/ERCs

6.1 Offsets: The emission offset thresholds of Regulation VIII are not exceeded.

6.2 ERCs: This source does not generate emission reduction credits.

7.0 AIR TOXICS

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

8.0 CEQA / LEAD AGENCY

This permit application qualifies for a General Exemption under CEQA Section 15061 (b) (3) as the project is not listed in the APCD Exemption List and it can be seen with certainty that the project will not have a significant adverse effect on the environment.

9.0 SCHOOL NOTIFICATION

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

10.0 PUBLIC and AGENCY NOTIFICATION PROCESS/COMMENTS ON DRAFT PERMIT

10.1 This project was not subject to public notice.

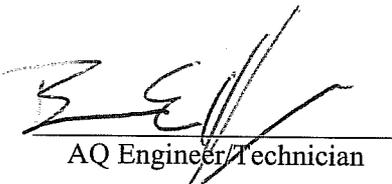
10.2 Venoco commented that the proposed location had been moved approximately 150 feet south along Las Armas Road. The description of the location was revised to reflect this.

11.0 FEE DETERMINATION

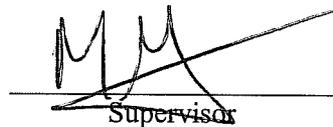
Fees for the APCD's work effects are assessed on a fee basis. The Project Code is *Project Code 300500 (Oil and Gas Plant)*. See the *Fee Statement Attachment* for the fee calculations.

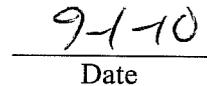
12.0 RECOMMENDATION

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


AQ Engineer/Technician


Date


Supervisor


Date

13.0 ATTACHMENT(S)

- Fee Statement
- Location Drawing

FEE STATEMENT

PTO No. 07904 - 04

FID: 00028 Ellwood Onshore Facility / SSID: 01063



**Santa Barbara County
Air Pollution Control District**

Permit Fee

Admin Change

372.00

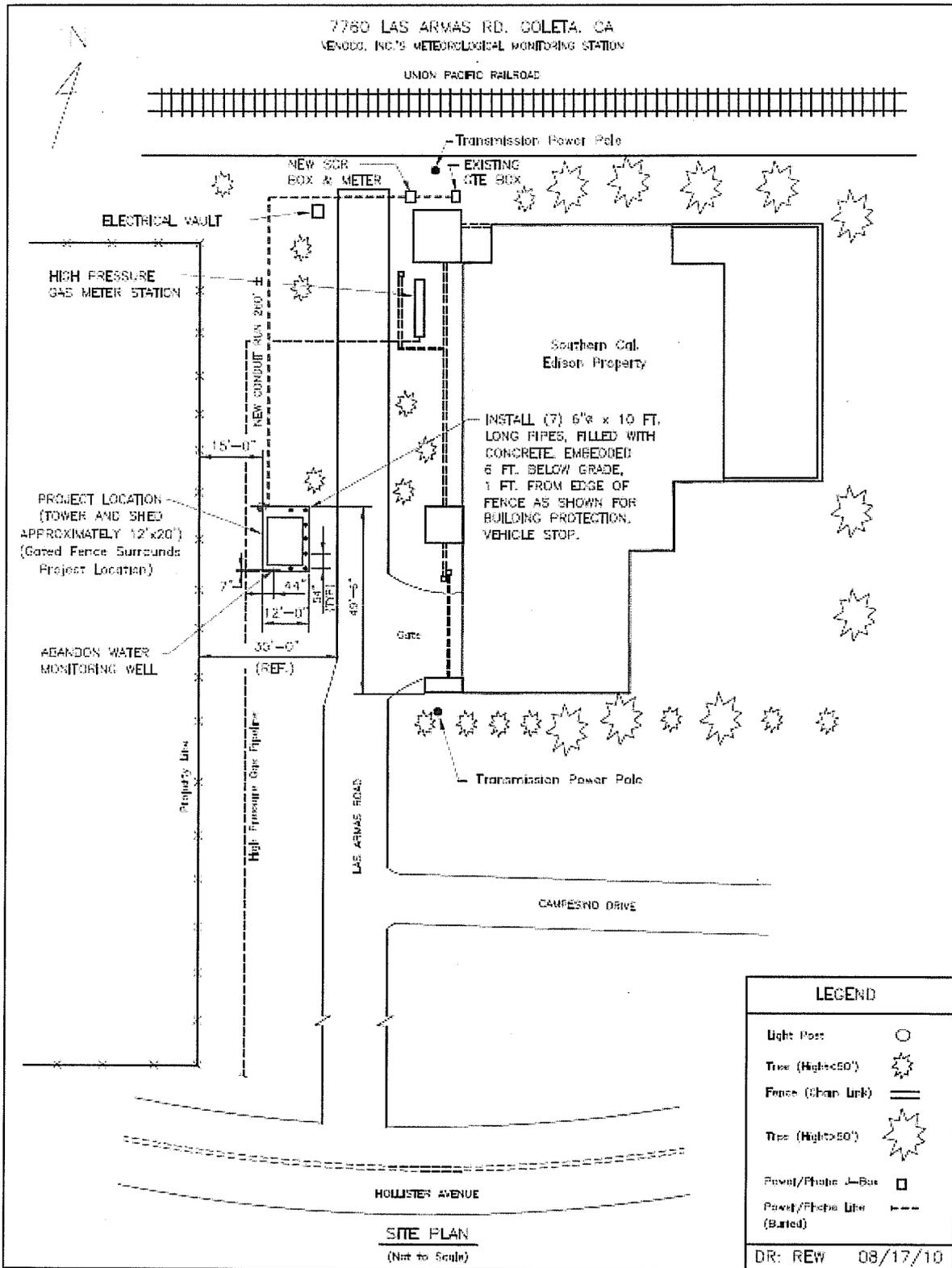
Fee Statement Grand Total = \$372

Notes:

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

Permit to Operate Mod 7904 04

ATTACHMENT





VENOCO, INC.

June 18, 2010

Mr. Ben Ellenberger
Santa Barbara County APCD
260 N. San Antonio Road, Suite A
Santa Barbara, CA 93110-1315

SSID: 1063
FID: 0028

Re: Permit to Operate (PTO) Modification Application for Ellwood Onshore Facility,
Part 70 Operating Permit and PTO No. 7904-R8 to Relocate Ambient Air
Monitoring Station

Dear Mr. Ellenberger:

This PTO Modification Application is being submitted to include the new address of the ambient air monitoring station that is being relocated. The location identified in Table 9-7, Permit Condition No. 9.C.17 will be changed from "Goleta Storage Facility, 7760 Hollister Avenue, Goleta, CA 93117" to "Dead end of Las Armas Rd., Goleta, CA 93117".

Enclosed in this application package is Form APCD-01; Part 70 Forms 1302-A1, 1302-A2, 1302-M; and a map showing the new location of the ambient air monitoring station.

Please bill Venoco for the Rule 210 application fee.

If you have any questions concerning this application, please call me at (805) 745-2270.

Sincerely,

Laura Kranzler
Coastal Assets Environmental Coordinator

Attachments: Permit Application Form APCD-01
Part 70 Application Forms 1302-A1, -A2, and -M
Map

C: Keith Wenal, Venoco, Inc. (w/o enclosures)



General Permit Application Form -01

Santa Barbara County Air Pollution Control District
PO Box 6447, Santa Barbara, CA 93160-6447

1. APPLICATION TYPE (check all that apply):

- Authority to Construct (ATC)
- Permit to Operate (PTO)
- ATC Modification
- PTO Modification
- Other (Specify) _____
- Transfer of Owner/Operator (use Form -01T)
- Emission Reduction Credits
- Increase in Production Rate or Throughput
- Decrease in Production Rate or Throughput

Previous ATC/PTO Number (if known) PTO No. 7904-R8

Yes No Are Title 5 Minor Modification Forms Attached? (this applies to Title 5 sources only and applies to all application types except ATCs and Emission Reduction Credits). Complete Title 5 Form -1302 A1/A2, B, and M. Complete Title 5 Form -1302 C1/C2, D1/D2, E1/E2, F1/F2, G1/G2 as appropriate. [http://www.sbapcd.org/eng/dl/appforms/t5-forms\(ver1.2\).pdf](http://www.sbapcd.org/eng/dl/appforms/t5-forms(ver1.2).pdf)

Mail the completed application to the APCD's Engineering & Compliance Division (ECD) at the address listed above.

2. FILING FEE:

A \$335 application filing fee must be included with each application. The application filing fee is COLA-adjusted every July 1st. Please ensure you are remitting the correct current fee (the current fee schedule is available on the APCD's webpage at: <http://www.sbapcd.org/fees.htm>). This filing fee will not be refunded or applied to any subsequent application. Payment may also be made by credit card by using the Credit Card Authorization Form at the end of this application.

3. IS YOUR PROJECT'S PROPERTY BOUNDARY LOCATED OR PROPOSED TO BE LOCATED WITHIN 1,000 FEET FROM THE OUTER BOUNDARY OF A SCHOOL? If yes, and the project results in an emissions increase, submit a completed Form -03 (School Summary Form) <http://www.sbapcd.org/eng/dl/appforms/apcd-03.pdf> Yes No

If yes, provide the name of school(s)

Address of school(s)

City Zip Code

4. DOES YOUR APPLICATION CONTAIN CONFIDENTIAL INFORMATION? Yes No

If yes, please submit with a redacted duplicate application which shall be a public document. In order to be protected from disclosure to the public, all information claimed as confidential shall be submitted in accordance with APCD Policy & Procedure 6100-020 (*Handling of Confidential Information*): http://www.sbapcd.org/eng/dl/eng_p-and-p/6100-020.pdf, and meet the criteria of CA Govt Code Sec 6254.7. Failure to follow required procedures for submitting confidential information, or to declare it as confidential at the time of application, shall be deemed a waiver by the applicant of the right to protect such information from public disclosure. *Note: Part 70 permit applications may contain confidential information in accordance with the above procedures, however, the content of the permit documents must be public (no redactions).*

FOR APCD USE ONLY			DATE STAMP
FID	00028	Permit No.	<div style="border: 2px solid black; padding: 5px; font-weight: bold; font-size: 1.2em;">RECEIVED</div> <div style="border: 1px solid black; padding: 5px; font-weight: bold; font-size: 1.1em;">JUN 21 2010</div> <div style="border: 1px solid black; padding: 5px; font-weight: bold; font-size: 1.1em;">SBCAPCD</div>
Project Name	Ellwood Onshore Facility		
Filing Fee	335 ⁰⁰	202.E? YES / NO	
Billed			

5. COMPANY/CONTACT INFORMATION:

Owner Info		<input checked="" type="radio"/> Yes <input type="radio"/> No	Use as Billing Contact?
Company Name	Venoco, Inc.		
Doing Business As	Venoco, Inc.		
Contact Name	Laura Kranzler	Position/Title	Coastal Assets Environmental Coordinator
Mailing Address	6267 Carpinteria Ave., Suite 100		
City	Carpinteria	State	CA Zip Code 93013
Telephone	805-745-2270	Fax	805-745-1176 Email lkranzler@venocoinc.com

Operator Info		<input checked="" type="radio"/> Yes <input type="radio"/> No	Use as Billing Contact?
Company Name	Same as above		
Doing Business As			
Contact Name		Position/Title	
Mailing Address			
City		State	Zip Code
Telephone		Fax	Email

Authorized Agent Info*		<input type="radio"/> Yes <input checked="" type="radio"/> No	Use as Billing Contact?
Company Name	same as above		
Doing Business As			
Contact Name		Position/Title	
Mailing Address			
City		State	Zip Code
Telephone		Fax	Email

*Use this section if the application is not submitted by the owner/operator. Complete APCD Form -01A (<http://www.sbcapcd.org/eng/dl/appforms/apcd-01a.pdf>). Owner/Operator information above is still required.

SEND PERMITTING CORRESPONDENCE TO (check all that apply):	
<input checked="" type="checkbox"/> Owner	<input type="checkbox"/> Operator
<input type="checkbox"/> Authorized Agent	<input type="checkbox"/> Other (attach mailing information)

6. GENERAL NATURE OF BUSINESS OR AGENCY:

Oil and gas production

7. EQUIPMENT LOCATION (Address):

Specify the street address of the proposed or actual equipment location. If the location does not have a designated address, please specify the location by cross streets, or lease name, UTM coordinates, or township, range, and section.

Equipment Address	7979 Hollister Ave.		
City	Goleta	State	CA Zip Code 93117
Work Site Phone	+1 (805) 961-2301		

Incorporated (within city limits) Unincorporated (outside city limits) Used at Various Locations

Assessors Parcel No(s):

8. PROJECT DESCRIPTION:

(Describe the equipment to be constructed, modified and/or operated or the desired change in the existing permit. Attach a separate page if needed):

In PTO No. 7904-R8, modify the location identified in Table 9-7, Permit Condition No. 9.C.17 from "Goleta Storage Facility, 7760 Hollister Avenue, Goleta, CA 93117" to "Dead end of Las Armas Rd., Goleta, CA 93117"

9. DO YOU REQUIRE A LAND USE PERMIT OR OTHER LEAD AGENCY PERMIT FOR THE PROJECT DESCRIBED IN THIS APPLICATION?: Yes No

A. If yes, please provide the following information

Agency Name	Permit #	Phone #	Permit Date
City of Goleta	tbd		

* The lead agency is the public agency that has the principal discretionary authority to approve a project. The lead agency is responsible for determining whether the project will have a significant effect on the environment and determines what environmental review and environmental document will be necessary. The lead agency will normally be a city or county planning agency or similar, rather than the Air Pollution Control District.

B. If yes, has the lead agency permit application been deemed complete and is a copy of their completeness letter attached?

Yes No

Please note that the APCD will not deem your application complete until the lead agency application is deemed complete.

C. If the lead agency permit application has not been deemed complete, please explain.

Application is being resubmitted for newly agreed on location.

D. A copy of the final lead agency permit or other discretionary approval by the lead agency may be requested by the APCD as part of our completeness review process.

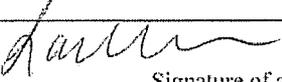
10. PROJECT STATUS:

- A. Date of Equipment Installation end of 3rd Quarter
- B. Have you been issued a Notice to Comply (NTC) or Notice of Violation (NOV) for not obtaining a permit Yes No for this equipment/modification *and/or* have you installed this equipment without the required APCD permit(s)? If yes, the application filing is double per Rule 210.
- C. Is this application being submitted due to the loss of a Rule 202 exemption? Yes No
- D. Will this project be constructed in multiple phases? If yes, attach a separate description of the nature and extent of each project phase, including the associated timing, equipment and emissions. Yes No
- E. Is this application also for a change of owner/operator? If yes, please also include a completed APCD Form -01T. Yes No

11. APPLICANT/PREPARER STATEMENT:

The person who prepares the application also must sign the permit application. The preparer may be an employee of the owner/operator or an authorized agent (contractor/consultant) working on behalf of the owner/operator (an *Authorized Agent Form -01A* is required).

I certify pursuant to H&SC Section 42303.5 that all information contained herein and information submitted with this application is true and correct.

	Jun 18, 2010
Signature of application preparer	Date

Laura Kranzler	Venoco, Inc.
Print name of application preparer	Employer name

12. APPLICATION CHECKLIST (*check all that apply*)

- Application Filing Fee (Fee = \$335. The application filing fee is COLA adjusted every July 1st. Please ensure you are remitting the current fee.) As a convenience to applicants, the APCD will accept credit card payments. If you wish to use this payment option, please complete the attached *Credit Card Authorization Form* and submit it with your application.
- Existing permitted sources may request that the filing fee be deducted from their current reimbursable deposits by checking this box. Please deduct the filing fee from my existing reimbursement account.
- Form -01T (*Transfer of Owner/Operator*) attached if this application also addresses a change in owner and/or operator status from what is listed on the current permit. <http://www.sbapcd.org/eng/dl/appforms/apcd-01t.pdf>
- Form -03 (*School Summary Form*) attached if the project's property boundary is within 1,000 feet of the outer boundary of a school (K-12) and the project results in an emissions increase. <http://www.sbapcd.org/eng/dl/appforms/apcd-03.pdf>
- Information required by the APCD for processing the application as identified in APCD Rule 204 (*Applications*), the APCD's *General APCD Information Requirements List* (<http://www.sbapcd.org/eng/dl/other/gen-info.pdf>), and any of the APCD's Process/Equipment Summary Forms (<http://www.sbapcd.org/eng/dl/dl01.htm>) that apply to the project.
- Form -01A (*Authorized Agent Form*) attached if this application was prepared by and/or if correspondence is requested to be sent to an Authorized Agent (e.g., contractor or consultant). This form must accompany each application. <http://www.sbapcd.org/eng/dl/appforms/apcd-01a.pdf>
- Confidential Information submitted according to APCD Policy & Procedure 6100-020. (*Failure to follow Policy and Procedure 6100-020 is a waiver of right to claim information as confidential.*)

13. NOTICE OF CERTIFICATION:

All applicants must complete the following Notice of Certification. This certification must be signed by the Authorized Company Representative representing the owner/operator. Signatures by Authorized Agents will not be accepted.

NOTICE of CERTIFICATION

I, Laura Kranzler, am employed by or represent
Type or Print Name of Authorized Company Representative

Venoco, Inc.
Type or Print Name of Business, Corporation, Company, Individual, or Agency

(hereinafter referred to as the applicant), and certify pursuant to H&SC Section 42303.5 that all information contained herein and information submitted with this application is true and correct and the equipment listed herein complies or can be expected to comply with said rules and regulations when operated in the manner and under the circumstances proposed. If the project fees are required to be funded by the cost reimbursement basis, as the responsible person, I agree that I will pay the Santa Barbara County Air Pollution Control District the actual recorded cost, plus administrative cost, incurred by the APCD in the processing of the application within 30 days of the billing date. If I withdraw my application, I further understand that I shall inform the APCD in writing and I will be charged for all costs incurred through closure of the APCD files on the project.

For applications submitted for Authority to Construct, modifications to existing Authority to Construct, and Authority to Construct/Permit to Operate permits, I hereby certify that all major stationary sources in the state and all stationary sources in the air basin which are owned or operated by the applicant, or by an entity controlling, controlled by, or under common control with the applicant, are in compliance, or are on approved schedule for compliance with all applicable emission limitations and standards under the Clean Air Act (42 USC 7401 *et seq.*) and all applicable emission limitations and standards which are part of the State Implementation Plan approved by the Environmental Protection Agency.

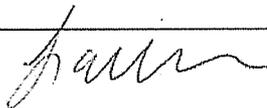
Completed By: Laura Kranzler

Title: Coastal Assets Environmental Coordinator

Date: Jun 18, 2010

Phone: 805-745-2270

Signature of Authorized Company Representative



**PLEASE NOTE THAT FAILURE TO COMPLETELY PROVIDE ALL REQUIRED INFORMATION OR FEES WILL
RESULT IN YOUR APPLICATION BEING RETURNED OR DEEMED INCOMPLETE.**

10. PROJECT STATUS:

A. Date of Equipment Installation

end of 3rd Quarter

B. Have you been issued a Notice to Comply (NTC) or Notice of Violation (NOV) for not obtaining a permit Yes No for this equipment/modification and/or have you installed this equipment without the required APCD permit(s)? If yes, the application filing is double per Rule 210.

C. Is this application being submitted due to the loss of a Rule 202 exemption? Yes No

D. Will this project be constructed in multiple phases? If yes, attach a separate description of the nature and extent of each project phase, including the associated timing, equipment and emissions. Yes No

E. Is this application also for a change of owner/operator? If yes, please also include a completed APCD Form -01T. Yes No

11. APPLICANT/PREPARER STATEMENT:

The person who prepares the application also must sign the permit application. The preparer may be an employee of the owner/operator or an authorized agent (contractor/consultant) working on behalf of the owner/operator (an *Authorized Agent Form -01A* is required).

I certify pursuant to H&SC Section 42303.5 that all information contained herein and information submitted with this application is true and correct.

 Signature of application preparer Jun 18, 2010 Date

Laura Kranzler Print name of application preparer Venoco, Inc. Employer name

12. APPLICATION CHECKLIST (check all that apply)

- Application Filing Fee (Fee = \$335. The application filing fee is COLA adjusted every July 1st. Please ensure you are remitting the current fee.) As a convenience to applicants, the APCD will accept credit card payments. If you wish to use this payment option, please complete the attached *Credit Card Authorization Form* and submit it with your application.
- Existing permitted sources may request that the filing fee be deducted from their current reimbursable deposits by checking this box. Please deduct the filing fee from my existing reimbursement account.
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- Form -03 (*School Summary Form*) attached if the project's property boundary is within 1,000 feet of the outer boundary of a school (k-12) and the project results in an emissions increase. <http://www.sbcapcd.org/eng/dl/appforms/apcd-03.pdf>
- Information required by the APCD for processing the application as identified in APCD Rule 204 (*Applications*), the APCD's *General APCD Information Requirements List* (<http://www.sbcapcd.org/eng/dl/other/gen-info.pdf>), and any of the APCD's *Process/Equipment Summary Forms* (<http://www.sbcapcd.org/eng/dl/dl01.htm>) that apply to the project.
- Form -01A (*Authorized Agent Form*) attached if this application was prepared by and/or if correspondence is requested to be sent to an Authorized Agent (e.g., contractor or consultant). This form must accompany each application. <http://www.sbcapcd.org/eng/dl/appforms/apcd-01a.pdf>
- Confidential Information submitted according to APCD Policy & Procedure 6100-020. (*Failure to follow Policy and Procedure 6100-020 is a waiver of right to claim information as confidential.*)

STATIONARY SOURCE SUMMARY (Form 1302-A2)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS Processing ID:
COMPANY NAME: Venoco Inc.	SOURCE NAME: Ellwood Onshore Facility

II. TYPE OF PERMIT ACTION

	CURRENT PERMIT (permit number)	EXPIRATION (date)
<input type="checkbox"/> Initial SBCAPCD's Regulation XIII Application		
<input type="checkbox"/> Permit Renewal		
<input type="checkbox"/> Significant Permit Revision*		
<input checked="" type="checkbox"/> Minor Permit Revision*	PTO No. 7904-R8	December 2011
<input type="checkbox"/> Administrative Amendment		

III. DESCRIPTION OF PERMIT ACTION

1. Does the permit action requested involve:
- | | | |
|----|----------------------------------------------------------------------------|----------------------------------------------------------|
| a: | <input type="checkbox"/> Portable Source | <input type="checkbox"/> Voluntary Emissions Caps |
| | <input type="checkbox"/> Acid Rain Source | <input type="checkbox"/> Alternative Operating Scenarios |
| | <input type="checkbox"/> Source Subject to MACT Requirements [Section 112] | |

b: None of the options in 1.a. are applicable

2. Is source operating under a Title V Program Compliance Schedule? Yes No

3. For permit modifications, provide a general description of the proposed permit modification:

In PTO No. 7904-R8, modify the location identified in Table 9-7, Permit Condition No. 9.C.17 from "Goleta Storage Facility, 7760 Hollister Avenue, Goleta, CA 93117" to "Dead end of Las Armas Rd., Goleta, CA 93117"

*Requires APCD-approved NSR permit prior to a permit revision submittal

Agreed new odor monitoring station location



ENCE

CONTINUOUS DRIVING SURFACE
OPEN SPACE

ENR PROPOSED PEDESTRIAN PATH

OPEN SPACE

ENHANCED ENTRY

LAS ARNAS RD

TUBE BLOCK OR APPROVED FIRE ACCESS

