



## PROPOSED

PERMIT TO OPERATE 13161  
AND  
PART 70 MINOR PERMIT MODIFICATION 13161

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EQUIPMENT OWNER:

BreitBurn Energy Company LP 300000

EQUIPMENT OPERATOR:

BreitBurn Energy Company LP

EQUIPMENT LOCATION:

Orcutt Hill Compressor Plant

STATIONARY SOURCE/FACILITY:

BreitBurn Energy - Orcutt Hill SSID: 02667  
Orcutt Hill Compressor Plant FID: 04104

EQUIPMENT DESCRIPTION:

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

PROJECT/PROCESS DESCRIPTION:

Operate a new 1,000 bbl wastewater tank at the Orcutt Hill Compressor Plant. Excess water produced from the Newlove Lease is processed through the Newlove Lease tank battery and piped to the new wastewater tank. The water from the wastewater tank is then injected into the producing formation.

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CONDITIONS:

**9.A Standard Administrative Conditions**

Section A lists the applicable standard administrative conditions for all equipment in this permit. Conditions listed in this section are enforceable by the USEPA, the APCD, the State of California and the public. Where any reference contained in this section refers to any other part of this permit, that part of the permit referred to is federally enforceable. 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.

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

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- A.2 **Emergency Provisions:** The permittee shall comply with the requirements of the APCD, Rule 505 (Upset/Breakdown rule) and/or APCD Rule 1303.F, whichever is applicable to the emergency situation. In order to maintain an affirmative defense under Rule 1303.F, the permittee shall provide the APCD, in writing, a “notice of emergency” within 2 days of the emergency. The “notice of emergency” shall contain the information/documentation listed in Sections (1) through (5) of Rule 1303.F. [*Re: 40 CFR 70.6, APCD Rule 1303.F*]
- A.3 **Compliance Plan:**
- (a) The permittee shall comply with all federally-enforceable requirements that become applicable during the permit term, in a timely manner, as identified in the Compliance Plan.
  - (b) For all applicable equipment, the permittee shall implement and comply with any specific compliance plan required under any federally-enforceable rules or standards. [*Re: APCD Rule 1302.D.2*]
- A.4 **Right of Entry:** The Regional Administrator of USEPA, the Control Officer, or their authorized representatives, upon the presentation of credentials, shall be permitted to enter upon the premises where a Part 70 Source is located or where records must be kept:
- (a) To inspect the stationary source, including monitoring and control equipment, work practices, operations, and emission-related activity;
  - (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 **Payment of Fees:** The permittee shall reimburse the APCD for all its Part 70 permit processing and compliance expenses for the stationary source on a timely basis. Failure to reimburse on a timely basis shall be a violation of this permit and of applicable requirements and can result in forfeiture of the Part 70 permit. Operation without a Part 70 permit subjects the source to potential enforcement action by the APCD and the USEPA pursuant to section 502(a) of the Clean Air Act. [*Re: APCD Rules 1303.D.1 and 1304.D.11, 40 CFR 70.6*]
- A.6 **Prompt Reporting of Deviations:** The permittee shall submit a written report to the APCD documenting each and every deviation from the requirements of this permit or any applicable

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federal requirements within 7 days after discovery of the violation, but not later than 180-days after the date of occurrence. The report shall clearly document 1) the probable cause and extent of the deviation, 2) equipment involved, 3) the quantity of excess pollutant emissions, if any, and 4) actions taken to correct the deviation. The requirements of this condition shall not apply to deviations reported to APCD in accordance with Rule 505. *Breakdown Conditions*, or Rule 1303.F *Emergency Provisions*. [APCD Rule 1303.D.1, 40 CFR 70.6(a) (3)]

- A.7 **Reporting Requirements/Compliance Certification:** The permittee shall submit compliance certification reports to the USEPA and the Control Officer every six months. These reports shall be submitted on APCD forms and shall identify each applicable requirement/condition of the permit, the compliance status with each requirement/condition, the monitoring methods used to determine compliance, whether the compliance was continuous or intermittent, and include detailed information on the occurrence and correction of any deviations (excluding emergency upsets) from permit requirement. The reporting periods shall be each half of the calendar year, e.g., January through June for the first half of the year. These reports shall be submitted by September 1 and March 1, respectively, each year. Supporting monitoring data shall be submitted in accordance with the “Semi-Annual Monitoring/Compliance Verification Report” condition in section 9.C. The permittee shall include a written statement from the responsible official, which certifies the truth, accuracy, and completeness of the reports. [Re: APCD Rules 1303.D.1, 1302.D.3, 1303.2.c]
- A.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]
- A.9 **Recordkeeping Requirements:** Records of required monitoring information shall include the following:
- (a) The date, place as defined in the permit, and time of sampling or measurements;
  - (b) The date(s) analyses were performed;
  - (c) The company or entity that performed the analyses;
  - (d) The analytical techniques or methods used;
  - (e) The results of such analyses; and
  - (f) The operating conditions as existing at the time of sampling or measurement.

The records (electronic or hard copy), as well as all supporting information including calibration and maintenance records, shall be maintained for a minimum of five (5) years from date of initial

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entry by BreitBurn Energy and shall be made available to the APCD upon request. [*Re: APCD Rule 1303.D.1.f, 40CFR70.6(a)(3)(ii)(A)*]

- A.10 **Conditions for Permit Reopening:** The permit shall be reopened and revised for cause under any of the following circumstances:
- (a) **Additional Requirements:** If additional applicable requirements (e.g., NSPS or MACT) become applicable to the source which has an unexpired permit term of three (3) or more years, the permit shall be reopened. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. However, no such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended. All such re-openings shall be initiated only after a 30-day notice of intent to reopen the permit has been provided to the permittee, except that a shorter notice may be given in case of an emergency.
  - (b) **Inaccurate Permit Provisions:** If the APCD or the USEPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit, the permit shall be reopened. Such re-openings shall be made as soon as practicable.
  - (c) **Applicable Requirement:** If the APCD or the USEPA determines that the permit must be revised or revoked to assure compliance with any applicable requirement including a federally-enforceable requirement, the permit shall be reopened. Such re-openings shall be made as soon as practicable.

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

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

- A.11 **Grounds for Revocation:** Failure to abide by and faithfully comply with this permit shall constitute grounds for the APCO to petition for permit revocation pursuant to California Health & Safety Code Section 42307 *et seq.*

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- A.12 **Consistency with Analysis:** Operation under this permit shall be conducted consistent with all data, specifications and assumptions included with the application and supplements thereof (as documented in the APCD's project file) and the APCD's analyses under which this permit is issued as documented in the Permit Analyses prepared for and issued with the permit.
- A.13 **Equipment Maintenance:** The equipment listed in this permit shall be properly maintained and kept in good condition at all times. The equipment manufacturer's maintenance manual, maintenance procedures and/or maintenance checklists (if any) shall be kept on site.
- A.14 **Compliance:** Nothing contained within this permit shall be construed as allowing the violation of any local, state or federal rules, regulations, air quality standards or increments.
- A.15 **Severability:** In the event that any condition herein is determined to be invalid, all other conditions shall remain in force.
- A.16 **Conflict Between Permits.** The requirements or limits that are more protective of air quality shall apply if any conflict arises between the requirements and limits of this permit and any other permitting actions associated with the equipment permitted herein.
- A.17 **Access to Records and Facilities:** As to any condition that requires for its effective enforcement the inspection of records or facilities by the APCD or its agents, the permittee shall make such records available or provide access to such facilities upon notice from the APCD. Access shall mean access consistent with California Health and Safety Code Section 41510 and Clean Air Act Section 114A.
- A.18 **Equipment Identification:** Identifying tag(s) or name plate(s) shall be displayed on the equipment to show manufacturer, model number, and serial number. The tag(s) or plate(s) shall be issued by the manufacturer and shall be affixed to the equipment in a permanent and conspicuous position.
- A.19 **Emission Factor Revisions.** The APCD may update the emission factors for any calculation based on USEPA AP-42 or APCD emission factors at the next permit modification or permit reevaluation to account for USEPA and/or APCD revisions to the underlying emission factors.

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### 9.B Generic Conditions

The generic conditions listed below apply to all emission units, regardless of their category or emission rates. 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.

Section B lists the applicable ‘generic’ permit conditions, including emission standards for all equipment in this permit. Conditions listed in this section are enforceable by the USEPA, the APCD, the State of California and the public. Where any reference contained in this section refers to any other part of this permit, that part of the permit referred to is federally enforceable. 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 **Nuisance (Rule 303):** No pollutant emissions from any source at the permittee shall create nuisance conditions. Operations shall not endanger health, safety or comfort, nor shall they damage any property or business. [*Re: APCD Rule 303*]
- B.3 **Organic Solvents (Rule 317):** The permittee shall comply with the emission standards listed in Rule 317.B. Compliance with this condition shall be based on the permittee’s compliance with Condition C.5 of PTO 8174-R5 and facility inspections. [*Re: APCD Rule 317*]
- B.4 **Metal Surface Coating Thinner and Reducer (Rule 322):** The use of photochemically reactive solvents as thinners or reducers in metal surface coatings is prohibited. Compliance with this condition shall be based on the permittee’s compliance with Condition C.5 of PTO 8174-R5 and facility inspections. [*Re: APCD Rule 322*]
- B.5 **Architectural Coatings (Rule 323):** The permittee shall comply with the coating ROC content and handling standards listed in Section D of Rule 323 as well as the Administrative requirements listed in Section F of Rule 323. Compliance with this condition shall be based on the permittee’s compliance with Condition C.5 of PTO 8174-R5 and facility inspections. [*Re: APCD Rules 323, 317, 322, 324*]

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- B.6 **Disposal and Evaporation of Solvents (Rule 324):** The permittee shall not dispose through atmospheric evaporation of more than one and a half gallons of any photochemically reactive solvent per day. Compliance with this condition shall be based on the permittee's compliance with Condition C.5 of PTO 8174-R5 and facility inspections. [*Re: APCD Rule 324*]
- B.7 **Emergency Episode Plans (Rule 603):** During emergency episodes, the permittee shall implement the Emergency Episode Plan dated March 30, 1999. [*Reference APCD Rule 603*]
- B.8 **Adhesives and Sealants (Rule 353):** The permittee shall not use adhesives, adhesive bonding primers, adhesive primers, sealants, sealant primers, or any other primers, unless the permittee complies with the following:
- (a) Such materials used are purchased or supplied by the manufacturer or suppliers in containers of 16 fluid ounces or less; or alternately.
  - (b) When the permittee uses such materials from containers larger than 16 fluid ounces and the materials are not exempt by Rule 353, Section B.1, the total reactive organic compound emissions from the use of such material shall not exceed 200 pounds per year unless the substances used and the operational methods comply with Sections D, E, F, G, and H of Rule 353. Compliance shall be demonstrated by recordkeeping in accordance with Section B.2 and/or Section O of Rule 353.

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

This section contains non-generic federally-enforceable conditions, including emissions and operations limits, monitoring, recordkeeping and reporting for each specific equipment group. This section may also contain other non-generic conditions.

- C.1 **Emission Limitations.** The mass emissions from the equipment permitted herein shall not exceed the values listed in Table 1. Compliance shall be based on the operational, monitoring, recordkeeping and reporting conditions of this permit.

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**Table 1**  
**Permitted Emissions**

Equipment Category	NOx	ROC	CO	SOx	PM	PM10
<b>1,000 bbl Wastewater Tank</b>						
lbs/day		0.16				
tons/year		0.03				
<b>Fugitive Hydrocarbons</b>						
lbs/day		0.46				
tons/year		0.08				
<b>Total</b>						
lbs/day		0.62				
tons/year		0.11				

- C.2 **Operational Restrictions.** All process operations for the equipment listed in this section shall meet the requirements of APCD Rules 325 and 343. Compliance with these limits shall be assessed through compliance with the monitoring, recordkeeping and reporting conditions in this permit.
- C.3 **Monitoring.** The equipment listed in this section is subject to all the monitoring requirements of APCD Rule 325.H. The test methods outlined in APCD Rule 325.G shall be used, when applicable. In addition, the permittee shall perform the following compliance monitoring:
- a. For all degassing events, monitor the volume purged, characteristics of the vapor purged, and control device/method used.
- C.4 **Recordkeeping.** The tanks listed in this section are subject to all the recordkeeping requirements listed in APCD Rule 325.F. In addition, the permittee shall record the following:
- a. The permittee shall maintain a log of all degassing events, and record all the parameters listed in Condition 3 above.
- C.5 **Semi-Annual Monitoring/Compliance Verification Reports.** The permittee shall submit a report to the APCD every six months to verify compliance with the emission limits and other requirements of this permit. 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<sup>st</sup> and March 1<sup>st</sup> respectively, each year, and shall be in a format approved by the APCD. All logs and other basic source data not included in the report shall be available to the APCD upon request. The second report shall also include an annual report for the prior four quarters. The report shall include the following information:

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- a. Annual NO<sub>x</sub> and ROC emissions from both permitted and exempt equipment.

If the data required by this condition is reported in the Semi-Annual Report for other permits for the Compressor Plant, a separate report is not required for this permit.

### **9.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*), which states that the Control Officer may issue an operating permit subject to specified conditions. Permit conditions have been determined as being necessary for this permit to ensure that operation of the facility complies with all applicable local and state air quality rules, regulations and laws. Failure to comply with any condition specified pursuant to the provisions of Rule 206 shall be a violation of that rule, this permit, as well as any applicable section of the California Health & Safety Code.

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.

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- (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.

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AIR POLLUTION CONTROL OFFICER

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DATE

Attachments:

- Table 1- Permitted Emission Limits
- Permit Equipment List
- Permit Evaluation for Permit to Operate 13161

Notes:

- Reevaluation Due Date: June 2, 2012
- Stationary sources are subject to an annual emission fee (see Fee Schedule B-3 of Rule 210).
- This permit supersedes Authority to Construct ATC 13161

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Equipment List for Permit to Operate 13161

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**PERMIT EQUIPMENT LIST - TABLE A**

PTO 13161 / FID: 04104 Orcutt Hill Compressor Plant / SSID: 02667

**A PERMITTED EQUIPMENT**

**1 Wastewater Tank**

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<i>Device ID #</i>	<b>112692</b>	<i>Device Name</i>	<b>Wastewater Tank</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	1000.00 BBL
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	21.5 feet in diameter by 16 feet high. The tank is equipped with a blanket of produced gas and connected to the vapor recovery system.		

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**2 Fugitive Hydrocarbon Components**

**2.1 Valves - Gas Service**

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<i>Device ID #</i>	<b>112694</b>	<i>Device Name</i>	<b>Valves - Gas Service</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	1 clp		

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**2.2 Flanges & Connections - Gas Service**

<i>Device ID #</i>	<b>112695</b>	<i>Device Name</i>	<b>Flanges &amp; Connections - Gas Service</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	7 clps		
<i>Description</i>			

**2.3 Pressure Safety Valves - Gas Service**

<i>Device ID #</i>	<b>112696</b>	<i>Device Name</i>	<b>Pressure Safety Valves - Gas Service</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	1 clp		
<i>Description</i>			



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#### 1.0 BACKGROUND

- 1.1 General: Authority to Construct 13161 was issued August 18, 2009 for the installation of the wastewater tank. The tank is situated on the site of a previously permitted road oil tank (ID# 003918). The road oil tank has been demolished and depermitted in Part-70/Reeval 8174-R5 issued June 2, 2009. The Source Compliance Demonstration Period (SCDP) was conducted on December 3, 2009. The inspection report indicates that the SCDP conditions were satisfied.
- 1.2 Permit History: See Pt70 PTO 8174-R5 for a complete permitting history of this facility.
- 1.3 Compliance History: See Pt70 PTO 8174-R5 for a complete compliance history of this facility.

#### 2.0 ENGINEERING ANALYSIS

- 2.1 Equipment/Processes: Most of the water from the Newlove Lease is injected after being processed in the 10,000 bbl injection tank. Some water is sent to the Newlove 67 1,000 bbl injection tank that is located next to the compressor plant. The water is then sent to the Newlove 67 injection pumps or to T-210 and further cleaning for steam.

The water needed for steam is processed by the Wemco unit, nutshell filters, the VSEP/RO process and stored in T-230 prior to use by the steam generators. All this equipment is exempt and listed in the Diatomite permit. Some of the water sent to T-210 is spilt off after exiting the WEMCO and nutshell filters and is sent to the new 1,000 bbl wastewater tank at the compressor plant.

- 2.2 Emission Controls: A fugitive hydrocarbon inspection and maintenance program is used to comply with APCD Rule 331. An 80-percent reduction is applied to valves, fittings, and wellheads for implementation of Rule 331. The tank is equipped with a vapor recovery system. A 95-percent control efficiency is applied for the use of vapor recovery.
- 2.3 Emission Factors: Emission factors for each equipment item are documented in the attached emission calculation worksheets.

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- 2.4 Reasonable Worst Case Emission Scenario: Worst case emissions are based on operation of this facility at maximum permitted throughput levels, 24 hours/day, 365 days per year.
- 2.5 Emission Calculations: Detailed emission calculation spreadsheets may be found in Attachment "A". These emissions define the Potential to Emit for the permitted equipment.
- 2.6 Special Calculations: There are no special calculations.
- 2.7 BACT Analyses: Best Available Control Technology was not required for this project.
- 2.8 Enforceable Operational Limits: The permit has enforceable operating conditions that ensure the control device is operated properly.
- 2.9 Monitoring Requirements: Monitoring of the equipment's operational limits are required to ensure that the emission limits are enforceable. This permit requires monitoring the parameters required by APCD Rules 325.F and 331.G.
- 2.10 Recordkeeping and Reporting Requirements: The permit requires that the annual NO<sub>x</sub> and ROC emissions from both permitted and exempt equipment be recorded and reported to the APCD.

### **3.0 REEVALUATION REVIEW (not applicable)**

### **4.0 REGULATORY REVIEW**

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

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

- 4.2 Rules Requiring Review: None

- 4.3 NEI Calculations: The net emission increase calculation is used to determine whether certain requirements must be applied to a project (e.g., offsets, AQIA, PSD BACT). The NEI values for

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the stationary source (the I, P1, P2 and D terms of the NEI calculation) are documented in Attachment "B". The ROC emissions increase for the new tank is NEI and constitutes an "I" term. The applicant requested a "P2" term for the removal of the road oil tank. However, there is no record of the road oil tank being installed after 1990 and has never been included in the NEI calculations for the Compressor Plant. Thus the road oil tank does not qualify for a "P2" term.

#### **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 project is exempt from CEQA pursuant to the Environmental Review Guidelines for the Santa Barbara County APCD (revised November 16, 2000). Appendix A (*APCD Projects Exempt from CEQA and Equipment or Operations Exempt from CEQA*) provides an exemption specifically for permits to operate. No further action is necessary.

#### **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**

This project was not subject to public notice.

#### **11.0 FEE DETERMINATION**

Fees for the APCD's work effects are assessed on a fee basis. The Project Code is 300000 (*Onshore Oil and Gas Lease*). See the *Fee Statement* Attachment for the fee calculations.



# ATTACHMENT “A”

## Emission Calculations

## FUGITIVE HYDROCARBON CALCULATIONS - CARB/KVB METHOD

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ADMINISTRATIVE INFORMATION
Attachment: A-1
Company: BreitBurn
Facility: Orcutt Hill Compressor Plant
Processed by: JJM
May 27, 2010
Path & File Name:
\\sbcapcd.org\shares\Groups\ENGR\WP\PT70SRCE\PERMITS\O&G-PROD\Breitburn Orcutt\Compressor Plant\PTOs\PTO 13161\PTO 13161 Calcs.xls\WW Tank

Version: fhc-kvb5.xls  
Date: 24-Oct-00

Reference: CARB speciation profiles #s 529, 530, 531, 532

<u>Data</u>	<u>Value</u>	<u>Units</u>
Number of Active Wells at Facility	0	wells
Facility Gas Production		scf/day
Facility Dry Oil Production		bbls/day
Facility Gas to Oil Ratio (if > 500 then default to 501)	501	scf/bbl
API Gravity	31	degrees API
Facility Model Number	6	dimensionless
No. of Steam Drive Wells with Control Vents	0	wells
No. of Steam Drive Wells with Uncontrolled Vents	0	wells
No. of Cyclic Steam Drive Wells with Control Vents	0	wells
No. of Cyclic Steam Drive Wells with Uncontrolled Vents	0	wells
Composite Valve and Fitting Emission Factor	4.2085	lb/day-well

Lease Model	Valve	Fitting	Composite	
	ROG Emission Factor Without Ethane	ROG Emission Factor Without Ethane	ROG Emission Factor Without Ethane	
1	1.4921	0.9947	2.4868	lbs/day-well
2	0.6999	0.6092	1.3091	lbs/day-well
3	0.0217	0.0673	0.0890	lbs/day-well
4	4.5090	2.1319	6.6409	lbs/day-well
5	0.8628	1.9424	2.8053	lbs/day-well
6	1.7079	2.5006	4.2085	lbs/day-well

- Model #1: Number of wells on lease is less than 10 and the GOR is less than 500.  
 Model #2: Number of wells on lease is between 10 and 50 and the GOR is less than 500.  
 Model #3: Number of wells on lease is greater than 50 and the GOR is less than 500.  
 Model #4: Number of wells on lease is less than 10 and the GOR is greater than 500.  
 Model #5: Number of wells on lease is between 10 and 50 and the GOR is greater than 500.  
 Model #6: Number of wells on lease is greater than 50 and the GOR is greater than 500.

### ROC Emission Calculation Summary Results Table Reactive Organic Compounds<sup>(c)</sup>

	lbs/hr	lbs/day	tons/year
Valves and Fittings <sup>(a)</sup>	0.00	0.00	0.00
Sumps, Wastewater Tanks and Well Cellars <sup>(b)</sup>	0.01	0.16	0.03
Oil/Water Separators <sup>(b)</sup>	0.00	0.00	0.00
Pumps/Compressors/Well Heads <sup>(a)</sup>	0.00	0.00	0.00
Enhanced Oil Recovery Fields	0.00	0.00	0.00
<b>Total Facility FHC Emissions (ROC)</b>	<b>0.01</b>	<b>0.16</b>	<b>0.03</b>

- a: Emissions amount reflect an 80% reduction due to Rule 331 implementation.  
 b: Emissions reflect control efficiencies where applicable.  
 c: Due to rounding, the totals may not appear correct

**Page 2 of 2**  
**Emission Calculation by Emission Unit**

**Pumps, Compressors, and Well Heads Uncontrolled Emission Calculations**

Number of Wells	0	wells
Wellhead emissions	0	ROC (lb/day)
FHC from Pumps	0	ROC (lb/day)
FHC from Compressors	0	ROC (lb/day)
Total:	0.0000	ROC (lb/day)

**Sumps, Uncovered Wastewater Tanks, and Well Cellars**

Efficiency Factor: (70% for well cellars, 0% for uncovered WW tanks, sumps and pits)

Unit Type/Emissions Factor

	Heavy Oil Service	Light Oil Service	
Primary	0.0941	0.138	(lb ROC/ft <sup>2</sup> -day)
Secondary	0.0126	0.018	(lb ROC/ft <sup>2</sup> -day)
Tertiary	0.0058	0.0087	(lb ROC/ft <sup>2</sup> -day)

**Surface Area and Type (emissions in lbs/day)**

Description/Name	Number	Area (ft <sup>2</sup> )	Primary	Secondary	Tertiary
Well Cellars <sup>(a)</sup>			0.00		
				0.00	
					0.00

(a) A 70% reduction is applied for implementation of Rule 344 (Sumps, Pits, and Well Cellars).

**Covered Wastewater Tanks**

Efficiency Factor: 85%

**Surface Area and Type (emissions in lbs/day)**

Description/Name	Number	Area (ft <sup>2</sup> )	Primary	Secondary	Tertiary
			0.00		
				0.00	
					0.00

**Covered Wastewater Tanks Equipped with Vapor Recovery**

Efficiency Factor: 95%

**Surface Area and Type (emissions in lbs/day)**

Description/Name	Number	Area (ft <sup>2</sup> )	Primary	Secondary	Tertiary
			0.00		
Wastewater Tank	1	363.05		0.00	0.16
			0.00	0.00	0.16

**Oil/Water Separators**

Efficiency Factor: varies (85% for cover, 95% for VRS, 0% for open top)

Emissions Factor: 560 (lb ROC/MM Gal)

**Type (emissions in lbs/day)**

Description/Name	TP-MM Gal	Equipped with Cover	Equipped with VRS	Open Top	Total lb/day
		0.0			
			0.0		
				0.0	
		0.0	0.0	0.0	0.0

FUGITIVE ROC EMISSIONS CALCULATION

ADMINISTRATIVE INFORMATION									
Attachment: A-2									
Company: BreitBurn									
Facility: Orcutt Compressor Plant									
Processed by: JJM									
Date: 05/28/2010									
Path & File Name:									
Facility Type: (Choose one)									
Production Field	x								
Gas Processing Plant									
Refinery									
Offshore Platform									
Component	Count <sup>(1)</sup>	ROC <sup>(2)</sup> Emission Factor (lbs/day-clp)	ROC/THC Ratio	Uncontrolled ROC Emission (lbs/day)	ROC Control Eff	Controlled ROC Emission (lbs/hr)	Controlled ROC Emission (lbs/day)	Controlled ROC Emission (Tons/Qtr)	Controlled ROC Emission (Tons/year)
<b>Gas Condensate Service</b>									
Valves - Acc/Inacc	1	0.295	0.31	0.09	0.80	0.00	0.02	0.00	0.00
Valves - Bellows		0.295	0.31	0.00	1.00	0.00	0.00	0.00	0.00
Valves - Unsafe		0.295	0.31	0.00	0.00	0.00	0.00	0.00	0.00
Valves - Low Emitting		0.295	0.31	0.00	0.00	0.00	0.00	0.00	0.00
Valves - E-500		0.295	0.31	0.00	0.85	0.00	0.00	0.00	0.00
Valves - E-100		0.295	0.31	0.00	0.90	0.00	0.00	0.00	0.00
Flanges - Acc/Inacc	7	0.070	0.31	0.15	0.80	0.00	0.03	0.00	0.01
Flanges - Unsafe		0.070	0.31	0.00	0.00	0.00	0.00	0.00	0.00
Flanges - E-500		0.070	0.31	0.00	0.85	0.00	0.00	0.00	0.00
Flanges - E-100		0.070	0.31	0.00	0.90	0.00	0.00	0.00	0.00
Compressor Seals - To Atm		2.143	0.31	0.00	0.80	0.00	0.00	0.00	0.00
Compressor Seals - To VRS		2.143	0.31	0.00	1.00	0.00	0.00	0.00	0.00
Compressor Seals - E-500		2.143	0.31	0.00	0.85	0.00	0.00	0.00	0.00
Compressor Seals - E-100		2.143	0.31	0.00	0.90	0.00	0.00	0.00	0.00
PSV - To Atm	1	6.670	0.31	2.07	0.80	0.02	0.41	0.02	0.08
PSV - To VRS		6.670	0.31	0.00	1.00	0.00	0.00	0.00	0.00
PSV - E-500		6.670	0.31	0.00	0.85	0.00	0.00	0.00	0.00
PSV - E-100		6.670	0.31	0.00	0.90	0.00	0.00	0.00	0.00
Pump Seals		1.123	0.31	0.00	0.80	0.00	0.00	0.00	0.00
Pump Seals - E-500		1.123	0.31	0.00	0.85	0.00	0.00	0.00	0.00
Pump Seals - E-100		1.123	0.31	0.00	0.90	0.00	0.00	0.00	0.00
Sub Total	9			2.31		0.02	0.46	0.02	0.08
<b>Oil Service</b>									
Valves - Acc/Inacc		0.0041	0.56	0.00	0.80	0.00	0.00	0.00	0.00
Valves - Unsafe		0.0041	0.56	0.00	0.00	0.00	0.00	0.00	0.00
Valves - E-500		0.0041	0.56	0.00	0.85	0.00	0.00	0.00	0.00
Valves - E-100		0.0041	0.56	0.00	0.90	0.00	0.00	0.00	0.00
Flanges - Acc/Inacc		0.0020	0.56	0.00	0.80	0.00	0.00	0.00	0.00
Flanges - Unsafe		0.0020	0.56	0.00	0.00	0.00	0.00	0.00	0.00
Flanges - E-500		0.0020	0.56	0.00	0.85	0.00	0.00	0.00	0.00
Flanges - E-100		0.0020	0.56	0.00	0.90	0.00	0.00	0.00	0.00
Pump Seals - Single		0.0039	0.56	0.00	0.80	0.00	0.00	0.00	0.00
Pump Seals - E-500		0.0039	0.56	0.00	0.85	0.00	0.00	0.00	0.00
Pump Seals - E-100		0.0039	0.56	0.00	0.90	0.00	0.00	0.00	0.00
PSV - To Atm		0.2670	0.56	0.00	0.80	0.00	0.00	0.00	0.00
PSV - To VRS		0.2670	0.56	0.00	1.00	0.00	0.00	0.00	0.00
PSV - E-500		0.2670	0.56	0.00	0.85	0.00	0.00	0.00	0.00
PSV - E-100		0.2670	0.56	0.00	0.90	0.00	0.00	0.00	0.00
Sub Total	0			0.00		0.00	0.00	0.00	0.00
<b>Total</b>	<b>9</b>			<b>2.31</b>		<b>0.02</b>	<b>0.46</b>	<b>0.02</b>	<b>0.08</b>
Notes:									
1. Source:									
2. APCD P&P # 6100.060.1998.									
3. APCD P&P # 6100.061.1998									
4. A 80% efficiency is assigned to fugitive components Rule 331 implementation.									

# ATTACHMENT “B”

## IDS Tables



**Facility Emissions Summary**  
**Orcutt Hill Compressor Plant FID 4104**

**I. This Projects "I" NEI-90**

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

**II. This Facility's "P1s"**

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

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr										
P11580	03/29/06			1.55	0.28								
P12032	06/05/07			0.92	0.17								
A13161	08/18/09			0.62	0.11								
<b>Totals</b>		<b>0.00</b>	<b>0.00</b>	<b>3.09</b>	<b>0.56</b>	<b>0.00</b>							

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

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

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

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

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

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

Enter all facility "D" decreases below:

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr										
P11580	3/29/2006			1.02	0.19								
P12032	6/5/2007			0.90	0.16								
<b>Totals</b>		<b>0.00</b>	<b>0.00</b>	<b>1.92</b>	<b>0.35</b>	<b>0.00</b>							

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

**V. Calculated This Facility's NEI-90**

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

Term	NOx		ROC		CO		SOx		PM		PM10	
	lb/day	ton/yr										
Project "I"	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P1	0.00	0.00	3.09	0.56	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
D	0.00	0.00	1.92	0.35	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>FNEI-90</b>	<b>0.00</b>	<b>0.00</b>	<b>1.17</b>	<b>0.21</b>	<b>0.00</b>							

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

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

**Facility FNEI-90 at this SSN**

Enter all other facility NEI-90s below:

Facility No.	Date Revised	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
3206		0.00	0.00	1.78	0.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3313		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3314		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3316		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3318		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3319		0.00	0.00	1.25	0.23	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3320		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3321		53.92	9.83	73.64	11.38	96.71	17.65	17.63	3.22	33.05	6.04	33.05	6.04
3322		0.00	0.00	0.75	0.14	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3323		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3324		0.00	0.00	0.85	0.16	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3495		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4104		0.00	0.00	1.17	0.21	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4214		11.04	0.23	0.60	0.01	9.27	0.19	0.58	0.01	0.06	0.01	0.06	0.01
10482		6.05	1.09	4.26	0.77	10.49	1.91	2.04	0.37	3.31	0.60	3.31	0.60
1904		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Totals</b>		<b>71.01</b>	<b>11.15</b>	<b>84.30</b>	<b>13.23</b>	<b>116.47</b>	<b>19.75</b>	<b>20.25</b>	<b>3.60</b>	<b>36.42</b>	<b>6.65</b>	<b>36.42</b>	<b>6.65</b>

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

**Calculate This SSN's NEI-90**

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

Term	NOx		ROC		CO		SOx		PM		PM10	
	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
<b>SSN NEI-90</b>	<b>71.01</b>	<b>11.15</b>	<b>84.30</b>	<b>13.23</b>	<b>116.47</b>	<b>19.75</b>	<b>20.25</b>	<b>3.60</b>	<b>36.42</b>	<b>6.65</b>	<b>36.42</b>	<b>6.65</b>

Notes:  
 (1) Resultant SSN NEI-90 from above Section I thru IV data.  
 (2) Totals only apply to permits for this facility ID. Totals may not appear correct due to rounding.  
 (3) Because of rounding, values in this table shown as 0.00 are less than 0.005, but greater than zero.  
 (4) Includes Phase 1 and 2 NEI under ATC 12084.

Table below summarizes Stationary Source NEI-90 (**adjusted**)

Term	NOx		ROC		CO		SOx		PM		PM10	
	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
<b>SSN NEI-90</b>	<b>38.01</b>	<b>5.13</b>	<b>57.59</b>	<b>9.00</b>	<b>59.47</b>	<b>9.35</b>	<b>9.14</b>	<b>1.57</b>	<b>18.42</b>	<b>3.36</b>	<b>18.42</b>	<b>3.36</b>

Notes:  
 (1) This Stationary Source NEI (adjusted) is applicable to all stationary source offset determinations until such time Phase 2 construction begins under ATC 12084. See NEI discussion in Engineering Evaluation in PTO 12273 for more details.

# ATTACHMENT “C”

## Fee Statement

# FEE STATEMENT

PTO No. 13161

FID: 04104 Orcutt Hill Compressor Plant / SSID: 02667



## Device Fee

Device No.	Device Name	Fee Schedule	Qty of Fee Units	Fee per Unit	Fee Units	Max or Min. Fee Apply?	Number of Same Devices	Pro Rate Factor	Device Fee	Penalty Fee?	Fee Credit	Total Fee per Device
112692	Wastewater Tank	A6	42.000	3.42	Per 1000 gallons	No	1	1.000	143.64	0.00	0.00	143.64
112695	Flanges & Connections - Gas Service	A1.a	1.000	59.72	Per equipment	No	1	1.000	59.72	0.00	0.00	59.72
<b>Device Fee Sub-Totals =</b>									<b>\$203.36</b>	<b>\$0.00</b>	<b>\$0.00</b>	
<b>Device Fee Total =</b>												<b>\$203.36</b>

## Permit Fee

Fee Based on Devices

203.36

**Fee Statement Grand Total = \$203**

### 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.