



VENOCO, INC.



December 10, 2012

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

Subject: PTO Application for ATC 13935 - EOF (FID 00028)

Dear Ben:

Enclosed is the PTO application for ATC 13935. Included are forms APCD-01, 1302-A1, 1302-A2, 1302-B and 1302-M. Also included, pursuant to condition 4.d of ATC 13935, is a copy of a letter describing the purging procedure of the depermitted equipment; the original letter was provided to Glenn Gazdecki during the 12/5/12 SCDP inspection. Pursuant to condition 4.c of ATC 13935, an electronic copy of the inventory of depermitted components which were removed from service in accordance with the ATC was transmitted by e-mail today to you, Jim Menno and Glenn Gazdecki, along with a PDF of this submittal.

Please debit the current filing fee amount from Venoco's reimbursable account. Feel free to contact me at (805) 745-2170, or at [john.garnett@venocoinc.com](mailto:john.garnett@venocoinc.com), if you have any questions or comments regarding this submittal.

Sincerely,

John Garnett  
Environmental Coordinator

Enclosures Noted



# General Permit Application Form -01

Santa Barbara County Air Pollution Control District  
260 N. San Antonio Road, Suite A  
Santa Barbara, CA 93110-1315

**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)

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.sbcapcd.org/eng/dl/appforms/t5-forms\(ver1.2\).pdf](http://www.sbcapcd.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 \$363 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.sbcapcd.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.sbcapcd.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.sbcapcd.org/eng/dl/eng\\_p-and-p/6100-020.pdf](http://www.sbcapcd.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	DEC 11 2012
Project Name	Permit No. PTO 13935 Ellwood Onshore Facility	
Filing Fee	Adjustable (reimbursable) acct 202.E? YES / NO	

**5. COMPANY/CONTACT INFORMATION:**

<b>Owner Info</b>		<input checked="" type="radio"/> Yes <input type="radio"/> No	Use as Billing Contact?
Company Name	Venoco, Inc.		
Doing Business As	same		
Contact Name	John Garnett	Position/Title	Environmental Coordinator
Mailing Address	6267 Carpinteria Ave.		
City	Santa Barbara	State	CA Zip Code 93105
Telephone	805-745-2170	Fax	Email john.garnett@venocoinc.com

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

<b>Authorized Agent Info*</b>		<input type="radio"/> Yes <input checked="" type="radio"/> No	Use as Billing Contact?
Company Name			
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.

<b>SEND PERMITTING CORRESPONDENCE TO</b> (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 & gas extraction

**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):

apply for Permit to Operate under ATC 13935

**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

\* 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.

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 N/A
  
- 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	<span style="border: 1px solid black; padding: 2px;">Dec 10, 2012</span> Date
John Garnett Print name of application preparer	Venoco, Inc. Employer name

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

- Application Filing Fee (Fee = \$363. 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.sbcapcd.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.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.*)

**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.

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NOTICE of CERTIFICATION

I, John Garnett, 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: John Garnett

Title: Environmental Coordinator

Date: Dec 10, 2012

Phone: 805-745-2170

Signature of Authorized Company Representative



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

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# STATIONARY SOURCE SUMMARY (Form 1302-A1)

APCD: Santa Barbara County Air Pollution Control District

COMPANY NAME: Venoco Inc.

## ➤ APCD USE ONLY ◀

APCD IDS Processing ID:

Application #:

Date Application Received:

Application Filing Fee\*:

Date Application Deemed Complete:

### I. SOURCE IDENTIFICATION

1. Source Name: Venoco-Ellwood Stationary Source, Ellwood Onshore Facility
2. Four digit SIC Code: 1311 USEPA AIRS Plant ID (for APCD use only):
3. Parent Company (if different than Source Name): Venoco Inc.
4. Mailing Address of Responsible Official: 6267 Carpinteria Ave., Suite 100; Carpinteria, CA 93013
5. Street Address of Source Location (include Zip Code): Ellwood Onshore Facility, 7979 Hollister Ave., Goleta, CA 93117
6. UTM Coordinates (if required) (see instructions):
7. Source located within:  
50 miles of the state line  Yes  No  
50 miles of a Native American Nation  Yes  No  Not Applicable
8. Type of Organization:  Corporation  Sole Ownership  Government  Partnership  Utility Company
9. Legal Owner's Name: Venoco Inc.
10. Owner's Agent Name (if any): Title: Telephone #:
11. Responsible Official: Larry Huskins Title: Operations Manager Telephone #: (805) 745-2100
12. Plant Site Manager/Contact: John Garnett Title: Environmental Coordinator Telephone #: (805)745-2170
13. Type of facility: Oil and Gas Production
14. General description of processes/products: Crude oil and natural gas
15. Does your facility store, or otherwise handle, greater than threshold quantities of any substance on the Section 112(r) List of Substances and their Thresholds (see Attachment A)?  Yes  No
16. Is a Federal Risk Management Plan [pursuant to Section 112(r)] required?  Not Applicable  Yes  No  
(If yes, attach verification that Risk Management Plan is registered with appropriate agency or description of status of Risk Management Plan submittal.)

\* Applications submitted without a filing fee will be returned to the applicant immediately as "improper" submittals

# STATIONARY SOURCE SUMMARY (Form 1302-A2)

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

## II. TYPE OF PERMIT ACTION

	CURRENT PERMIT (permit number)	EXPIRATION (date)
<input type="checkbox"/> Initial SBCAPCD's Regulation XIII Application		
Permit Renewal		
<input type="checkbox"/> Significant Permit Revision*		
<input checked="" type="checkbox"/> Minor Permit Revision*	ATC 13935	N/A
<input type="checkbox"/> Administrative Amendment		

## III. DESCRIPTION OF PERMIT ACTION

1. Does the permit action requested involve:
- a:     Portable Source             Voluntary Emissions Caps  
           Acid Rain Source             Alternative Operating Scenarios  
           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: Depermitting of fugitive emission components associated with the CO2 removal unit (Grace) located at Ellwood Onshore Facility (EOF).

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

## TOTAL STATIONARY SOURCE EMISSIONS (Form 1302-B)

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

### I. TOTAL STATIONARY SOURCE EMISSIONS

Provide a brief description of operating scenario : The Ellwood Onshore Facility consists of the following primary emission systems and processes: Crude oil receiving system; Crude oil processing system; Crude oil and other HC liquid storage & transfer system; Gas receiving system; Gas processing/delivery system, sulfur removal, including dehydration, sweetening and CO<sub>2</sub> removal; Gas compression/Low temperature system, including LPG/NGL recovery; Loading rack for LPG and NGL and other HC liquid trucks; Vapor/Flare gas collection and incineration system; Produced and waste water system; Pipeline and Equipment components with fugitive emissions; and, Support system including process heater.

POLLUTANT* (name)	EMISSIONS (tons per year)	PRE-MODIFICATION EMISSIONS (tons per year)	EMISSIONS CHANGE (tons per year)
NOx	13.39		
ROC	87.45	89.64	(2.19)
CO	88.76		
PM	2.80		
PM-10	2.72		
SOx	8.18		

\* Emissions for all pollutants for which the source is major and for all NSPS/MACT-regulated air pollutants must be reported. HAP emissions must be determined, and those exceeding one ton per year from any emission unit category must also be quantified; if less than one ton per year, just list the HAPs emitted by name.

# CERTIFICATION STATEMENT (Form 1302-M)

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

Identify, by checking off below, the forms and attachments that are part of your application. If the application contains forms or attachments that are not identified below, please identify these attachments in the blank space provided below. Review the instructions if you are unsure of the forms and attachments that need to be included in a complete application.

<b>Forms included with application:</b>  <input checked="" type="checkbox"/> Stationary Source Summary Forms <input checked="" type="checkbox"/> Total Stationary Source Emission Forms <input type="checkbox"/> Compliance Plan Form <input type="checkbox"/> Compliance Plan Certification Form <input type="checkbox"/> Exempt Equipment Form  <input type="checkbox"/> Certification Statement Form  <p style="text-align: center;"><b>List other forms or attachments:</b></p> <hr/> <hr/> <hr/> <p><input type="checkbox"/> Check here if additional forms are listed on the back</p>
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<b>Attachments included with application:</b>  <input type="checkbox"/> Description of Operating Scenarios <input type="checkbox"/> Sample Emissions Calculations <input type="checkbox"/> Fugitive Emission Estimates <input type="checkbox"/> List of Applicable Requirements <input type="checkbox"/> Discussion of units out of compliance with applicable federal requirements and, if required, submit a Schedule of Compliance <input type="checkbox"/> Facility schematic showing emission points <input type="checkbox"/> NSR Permit <input type="checkbox"/> PSD Permit <input type="checkbox"/> Compliance Assurance monitoring protocols <input type="checkbox"/> Risk management verification per 112(r)
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I certify under penalty of law, based on information and belief formed after reasonable inquiry, that the information contained in this application, composed of the forms and attachments identified above, are true, accurate, and complete.

I certify that I am the responsible official, as defined in SBCAPCD's Regulation XIII, Rule 1301 or USEPA's 40 CFR Part 70.

Signature of Responsible Official: 

Date: December 10, 2012

Print Name of Responsible Official: Larry Huskins

Title of Responsible Official and Company Name: Operations Manager

**CERTIFICATION STATEMENT  
(Form 1302-M Continued)**

<b>APCD:</b> Santa Barbara County Air Pollution Control District	<b>&gt; APCD USE ONLY &lt;</b> <b>APCD IDS PROCESSING ID:</b>
<b>COMPANY NAME:</b> Venoco Inc.	<b>SOURCE NAME:</b> Ellwood Onshore Facility

**List Other Forms or Attachments (cont.)**

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December 4, 2012

Glenn Gazdecki  
Santa Barbara County APCD  
260 N. San Antonio Rd. Suite A  
Santa Barbara, CA 93110

Subject: Purging of Depermitted Grace CO2 Removal Equipment at the Ellwood Onshore Facility (EOF)

Dear Glenn,

In accordance with condition 4.d of ATC 13935, Venoco submits the following description of procedures used to purge depermitted Grace CO2 removal equipment of hydrocarbons:

The depermitted portion of the 2<sup>nd</sup> Stage Grace skid was isolated from EOF gas processing equipment 4-5 years ago. On April 5, 2012 Operations depressurized 2<sup>nd</sup> Stage Grace to VRU suction pressure (1" WC). After Operations depressurized 2<sup>nd</sup> Stage Grace, nitrogen was used to pressure up isolated piping to 60 PSI, after which the piping was slowly depressurized back to the VRU. This process was performed 3 times. After the third time Operations installed slip blinds between multiple flanges to complete the isolation of the 2<sup>nd</sup> Stage Grace from EOF gas processing. After slip blinds were installed, Operations pressurized the isolated piping with nitrogen to 60 PSI.

Please let me know if you have any questions regarding this submittal. I can be reached at (805) 745-2170 or [john.garnett@venocoinc.com](mailto:john.garnett@venocoinc.com).

Sincerely,

John Garnett  
Environmental Coordinator