



Proposed
Permit to Operate 13935
and
Part 70 Minor Modification Number 13935

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EQUIPMENT OWNER:

Venoco, Inc. 390850

EQUIPMENT OPERATOR:

Venoco, Inc.

EQUIPMENT LOCATION:

7979 Hollister Avenue, Goleta

STATIONARY SOURCE/FACILITY:

Venoco - Ellwood SSID: 01063
Ellwood Onshore Facility FID: 00028

EQUIPMENT DESCRIPTION:

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

PROJECT/PROCESS DESCRIPTION:

The EOF is designed to receive oil, water and gas from Platform Holly and the Seep Containment devices located on State Coastal Lease 3242. At the EOF, gas and water are separated from the crude oil and the sour gas is processed to sales gas quality. The process gas is also treated for CO₂ removal at the Grace unit. Due to reduced gas volumes, the Grace unit was downsized under ATC 13935.

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Several process vessels and related fugitive emission components associated with the CO₂ removal unit (Grace) were depermitted. The emission reduction qualify for a reduction in NEI (P2).

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.

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[*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 **Indemnity and Separation Clauses.** The Applicant shall defend, indemnify and hold harmless the District or its agents, officers and employees from any claim, action or proceeding against the District or its agents, officers or employees, to attack, set aside, void, or annul, in whole or in part, the approval granted herein. In the event that the District fails promptly to notify the Applicant of any such claim, action or proceeding, or that the District fails to cooperate fully in the defense of said claim, this condition shall thereafter be of no force or effect. In the event that any condition contained herein is determined to be invalid, then all remaining conditions shall remain in force. [*Re: District Rules 103 and 1303.D.1*]

A.6 **Permit Life.** The Part 70 permit shall become invalid three years from the date of issuance unless a timely and complete renewal application is submitted to the APCD. Any operation of the source to which this Part 70 permit is issued beyond the expiration date of this Part 70 permit and without a valid Part 70 operating permit (or a complete Part 70 permit renewal application) shall be a violation of the CAAA, § 502(a) and 503(d) and of the APCD rules.

The permittee shall submit an application for renewal of the Part 70 permit not later than 6 months before the date of the permit expiration. Upon submittal of a timely and complete renewal application, the Part 70 permit shall remain in effect until the Control Officer issues or denies the renewal application. [*Re: APCD Rule 1304.D.1*]

A.7 **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*]

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- A.8 **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.9 **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.10 **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.11 **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)]

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- A.12 **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 that 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

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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]

B.4 **PM Concentration - South Zone (Rule 305).** Venoco shall not discharge into the atmosphere, from any source, particulate matter in excess of the concentrations listed in Table 305(a) of Rule 305. [Re: APCD Rule 305]

B.5 **Specific Contaminants (Rule 309).** Venoco shall not discharge into the atmosphere from any single source sulfur compounds, carbon monoxide and combustion contaminants in excess of the applicable standards listed in Sections A, E and G of Rule 309. [Re: APCD Rule 309].

B.6 **Sulfur Content of Fuels (Rule 311).** Venoco shall not burn fuels with a sulfur content in excess of 0.5% (by weight) for liquid fuels and 239 ppmvd or 15 gr/100 scf (calculated as H₂S) for gaseous fuel (most gaseous fuel burning equipment at EOF is subject to more stringent sulfur content limits). Compliance with the requirements pertaining to gaseous fuels shall be based on measurements of the in-plant fuel gas using continuous analyzers, sulfur detection tubes, ASTM, or other APCD-approved methods; and, compliance with the requirements pertaining to liquid fuels shall be based on diesel fuel billing records or other data showing the certified sulfur content for each shipment. [Re: APCD Rule 311]

B.7 **Organic Solvents (Rule 317).** Venoco shall comply with the emission standards listed in Section B of Rule 317. Compliance with this condition shall be based on Venoco's compliance with the Solvent Usage condition of this permit. [Re: APCD Rule 317]

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- B.8 **Vacuum Producing Devices or Systems – Southern Zone (Rule 318).** Venoco shall not discharge into the atmosphere more than 3 pounds of organic materials in any one hour from any vacuum producing devices or systems, including hot wells and accumulators, unless said discharge has been reduced by at least 90 percent. [*Re: APCD Rule 318*]
- B.9 **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 Venoco's compliance with the Solvent Usage condition of this permit and facility inspections. [*Re: APCD Rule 322*]
- B.10 **Architectural Coatings (Rule 323).** Venoco shall comply with the emission 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 Venoco's compliance with the Solvent Usage condition of this permit and facility inspections. [*Re: APCD Rules 323*]
- B.11 **Disposal and Evaporation of Solvents (Rule 324).** Venoco 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 Venoco's compliance with the Solvent Usage condition of this permit and facility inspections. [*Re: APCD Rule 324*]
- B.12 **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.
[*Re: APCD Rule 353*]
- B.13 **Oil and Natural Gas Production MACT.** Venoco shall comply with the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPS) for Oil and Natural Gas Production and Natural Gas Transmission and Storage (promulgated June 17, 1999), *including any applicable MACT recordkeeping and reporting requirements.* [*Re: 40 CFR 63, Subpart HH*]

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B.14 **CARB-Registered Portable Equipment.** State-registered portable equipment shall comply with State registration requirements. A copy of the State registration shall be readily available whenever the equipment is at the facility. [Re: APCD Rule 202]

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.

C.3 **Fugitive Hydrocarbon Emissions Components.** The following permitted equipment is included in this emissions unit category:

District ID No.	Venoco Equipment No.	Equipment
		<i>Gas/Light Liquid Service Components and associated leak paths</i>
000297	N/A	Valves: Accessible – <i>component leak path = 3488</i>
000310	N/A	Valves: Inaccessible – <i>component leak path = 4</i>
009118	N/A	Valves: Unsafe – <i>component leak path = 6</i>
000300	N/A	Connections: Accessible – <i>component leak path = 19244</i>
000312	N/A	Connections: Inaccessible – <i>component leak path = 2327</i>
009120	N/A	Connections: Unsafe – <i>component leak path = 78</i>
009122	N/A	Pressure Relief Valves: Accessible – <i>component leak path = 74</i>
009123	N/A	Pressure Relief Valves: Inaccessible – <i>component leak path = 2</i>
107363	N/A	Pressure Relief Valves: Unsafe – <i>component leak path = 0</i>
009121	N/A	Compressor Seals: -- <i>component leak path = 20</i>
009125	N/A	Pump Seals: -- <i>component leak path = 10</i>
		<i>Oil Service Components and associated leak paths</i>
000298	N/A	Valves: Accessible – <i>component leak path = 516</i>
000301	N/A	Connections: Accessible – <i>component leak path = 2617</i>
107364	N/A	Connections: Unsafe – <i>component leak path = 0</i>
009127	N/A	Pressure Relief Valves: Accessible – <i>component leak path = 0</i>
009128	N/A	Pump Seals; -- <i>component leak path = 7</i>

(a) Emission Limits: Mass emissions from the gas/light liquid service and oil service components listed above shall not exceed the limits listed in Table 5.1-3 and Table 5.1-4.

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- (b) Operational Limits: Operation of the equipment listed in this section shall conform to the requirements listed in Sections D and E of District Rule 331 and NSPS Subpart KKK. Compliance with these limits shall be assessed through the monitoring, recordkeeping and reporting conditions in this permit. In addition, Venoco shall meet the following requirements:
- (i) *I&M Program* - The District-approved I&M Plan and any subsequent District-approved updates for the EOF shall be implemented for the life of the project. The Plan, and any subsequent District approved revisions, is incorporated by reference as an enforceable part of this permit.
 - (ii) *Leak-Path Count* - Component and leak-path count inventory updates provided by Venoco shall not exceed the District approved totals by more than five percent. This five percent range is to allow for minor differences due to component counting methods and does not constitute allowable emissions growth due to the addition of new equipment. (Note: 'de minimis' component-leak-path count is not included in Table 5.1-1.)
 - (iii) *Venting* - All routine venting of hydrocarbons shall be routed to either the VRU compressor, flare header or other District-approved control device.
 - (iv) *VRU Use* - The VRU and gas collection (GC) systems at the EOF shall be in operation when equipment connected to these systems is in use. These systems include piping, valves, and flanges associated with the VRU & GC systems. The VRU & GC systems shall be maintained and operated to minimize the release of emissions from all systems, including pressure relief valves and gauge hatches.
 - (v) *Emission Reduction Credits* - The emission reductions created under PTO 7904-R9 are for the use as offsets by The Point Arguello Companies to meet the requirements under Permit to Operate 5704 (version 27 March 1996 or subsequent updates to that permit). Emission reduction measures implemented to create the required emission reductions shall be in place and maintained for the life of the Gaviota project. This permit does not authorize the dedication of these emission reductions to any other project without prior written approval by the District. The District will assess any such proposal in accordance with applicable District rules and regulations in effect at the time an application is determined to be complete by the District.
 - (vi) *ERC Inspection & Maintenance (I&M) Program* - The permittee shall implement the ERC fugitive hydrocarbon inspection and maintenance program at the EOF. The inspection and maintenance program shall be consistent with District Rule 331 (Fugitive Emissions Inspection and Maintenance). However, the permittee shall also

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comply with other specified recordkeeping and reporting requirements as outlined in the *Fugitive Hydrocarbon Inspection and Maintenance Program Plan* as approved by the District and any subsequent District-approved updates.

- (vii) *Reimbursement of Costs* - All costs reasonably incurred by the District, including District consultants and Legal Counsel (but not attorney's fees in litigation) related to the implementation and enforcement of the ERC I&M Program shall be reimbursed by Venoco within thirty (30) calendar days of invoicing by the District. If, for any reason, the District is unable to obtain full reimbursement for all costs incurred, the District may revoke or suspend this permit until such a time that a complete application (including the payment of all outstanding invoices) for the reinstatement of the permit is received by the District.
- (c) Monitoring: The equipment listed in this section is subject to all the monitoring requirements listed in 40 CFR Part 60, Subpart KKK and District Rule 331.F. The test methods in Subpart KKK and Rule 331.H shall be used, when applicable. In addition, Venoco shall track the 'component-leak-path' (clp) counts for all categories of components at the EOF that are listed in the Section C.3 table of PTO 7904-R9 and, log any 'clp' count changes, including de minimis changes, in a component-leak-path inventory maintained for the facility.
- (d) Recordkeeping: All inspection and repair records shall be retained at the source for a minimum of five years. The equipment listed in this section is subject to all the recordkeeping requirements listed in 40 CFR Part 60 Subpart KKK and District Rule 331.G and the District-approved I&M Plan (see Condition 9.C.16 of PTO 7904-R9) and any subsequent updates. The following shall also apply:
- (i) *I&M Log* - Venoco shall record in a log the following:
- a record of leaking components found (including name, location, type of component, date of leak detection, the ppmv or drop-per-minute reading, date of repair attempts, method of detection, date of re-inspection and ppmv or drop-per-minute reading following repair);
 - a record of the total components inspected and the total number and percentage found leaking by component type;
 - a record of leaks from critical components;
 - a record of leaks from components that incur five repair actions within a continuous 12-month period;
 - a record of component repair actions including dates of component re-inspections; and,
 - a table showing clearly all changes in the 'clp' counts from the count shown in the Section C.3 Table of PTO 7904-R9, for all categories of components including

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the 'de minimis' components at the facility.

- (ii) Venoco shall also maintain, on a quarterly basis, adequate records to verify that the 141.51 tons/yr ROC emission reductions required under this permit to provide adequate credits to PXP's Pt. Arguello Project are actually being attained and are in compliance with the District Rules and Regulations. These records shall include all information required under the District-approved I&M Plan and any subsequent District-approved updates.
- (e) Reporting: On a semi-annual basis, a report detailing the previous six month's activities shall be provided to the District. The report must list all data required by the Compliance Verification Reports condition of PTO 7904-R9. [*Re: ATC 7234, ATC 9323, ATC 10022, 40 CFR 70.6(a)(3), Subpart KKK, District Rule 331*]

C.9. Grace Membrane Unit. The following equipment is included in this emission category:

District ID No.	Venoco Equip. ID No.	Name
009399	Bank A	Permeate Tubes - first stage skid - Bank A
106340	Bank C	Permeate Tubes - first stage skid - Bank C
106099	Bank B	Permeate Tubes - first stage skid - Bank B
009492	F-201	Filter Separator
009398	F-210	Guard Bed
009397	F-211	Polishing Filter

- (a) Operational Limits: The following operational limits shall apply:
 - (i) *Process Volumes* - The Grace Membrane Unit shall not treat more than 13 MMscf/day of gases for CO₂ separation. Any volume of gas recycled through the Grace Unit will not count toward this limit.
 - (ii) *Permeate Gas Output* - The combined heat content of "permeate gas" supplied to: (a) Process Heater Unit H-204, plus (b) Relief Header for Relief Scrubber V-221, plus (c) In-plant Fuel Gas Header, shall not exceed 58 MMBtu/hr.

NOTE: The hourly permeate gas volume flows shall be obtained by adding up (A) flow to H-204 as obtained at FIT-732, plus (B) flow to V-221 as obtained from readings at FR-567, plus (C) flow to In-plant Fuel Gas Header as obtained from readings at FR-250 (see Block Flow Diagram in Figure 4.2). The heat content of the total flow shall be computed based on the HHV of weekly samples obtained at FR-567, or other locations approved by the District.

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- (iii) *Heater Operation* - If the process heater H-204 is in operation, its total heat input requirement shall be met by the modified Grace Membrane Unit output, to the extent feasible. Only after meeting the full demand of the H-204 unit shall any excess flare gas produced by the Grace Unit be sent to the thermal oxidizer units H-205/206/207. This condition will be enforced through appropriate monitoring and recordkeeping.
- (b) Monitoring: Venoco shall monitor the following:
- (i) The hourly volume flow rate (in scf/hour) of: (a) gas inflow to the First-stage skid, as recorded by FR-560.
 - (ii) The hourly volume flow rate (in scf/hour) of: (A) First-stage permeate gas flow into H-204, as recorded by FIT-732, (B) First-stage permeate gas flow to the Relief Header for Relief Scrubber, as recorded by FR-567.
 - (iii) The weekly high heating value of first stage permeate stream. The high heating value of this stream shall be determined by lab analyses of samples taken at FR-567. Sampling at FR-567 does not need to be conducted if the first stage tubes are not in use during the week.
- (c) Recordkeeping: Data from all monitoring activities listed in Condition 2(b) above shall be recorded by Venoco. These records shall be kept for a minimum of five (5) years. All sampling and analysis data/results shall be submitted to the District in accordance with Permit Condition (d) below.
- (i) *Grace Unit Output Heating Value Records* - The *weekly* heating value (Btu/scf) lab analysis results for the Grace Unit output shall be compiled. Include copies of the lab's analysis sheets, obtained separately for the gas streams per Condition 2(b)(iii) above; and the computed MMBtu/hr value of the Grace Unit output, based on the weekly high heating value analyses and hourly gas flow volume records.
- (d) Reporting: Venoco shall submit the monitoring data recorded per Condition 2(c) with each Semi-Annual Compliance Verification Report required per PTO 7904-R9.

D. *District-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 District and the State of California. These conditions are issued pursuant to District Rule 206 (*Conditional Approval of Authority to Construct or Permit to Operate*)

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- D.1 **Permit Activation.** All aspects of this permit are enforceable by the District 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 District and these comments require no modification to this permit. The District 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 District's letter.
 - (b) After the USEPA has provided the District written comments that require a modification to this permit, the District 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.

AIR POLLUTION CONTROL OFFICER

DATE

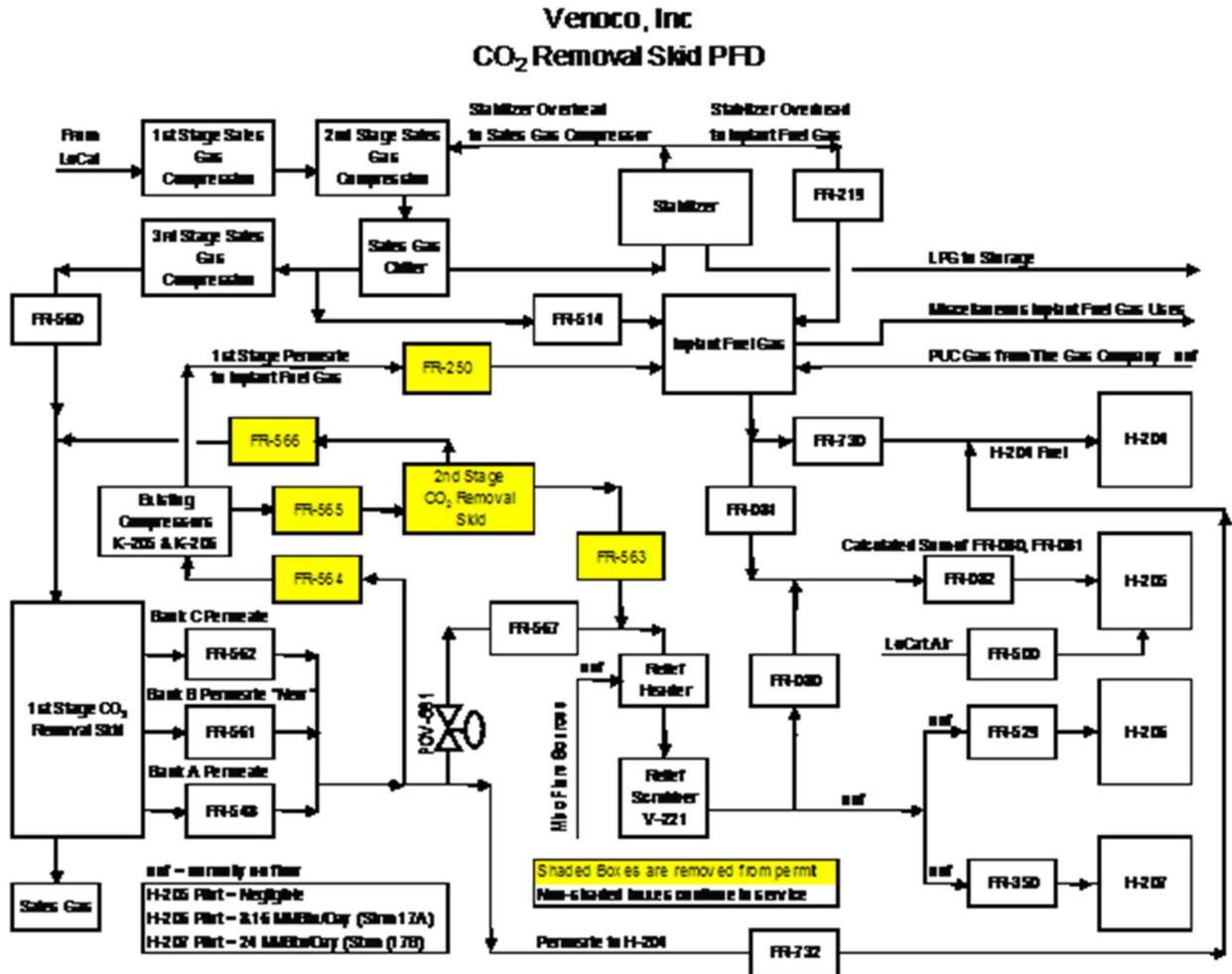
Attachments:

- Permit Evaluation for Permit to Operate 13935
- Figure 4.2

Notes:

- Reevaluation Due Date: December 22, 2014
- Stationary sources are subject to an annual emission fee (see Fee Schedule B-3 of Rule 210).
- This permit supersedes ATC 13935

Figure 4.2.





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PERMIT EVALUATION FOR PERMIT TO OPERATE 13935

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1.0 BACKGROUND

- 1.1 General: The Grace CO₂ removal unit treats produced gas from Platform Holly for CO₂ removal. This unit was modified under ATC 10941 (issued August 2004) and under ATC 11579 (issued September 2005) to increase the CO₂ removal efficiency of the plant. ATC 13935 was issued to remove from service the modifications made under ATC 11579. The application for PTO 13935 was received on December 11, 2012 and deemed complete January 7, 2012.
- 1.2 Permit History: There is no recent permit history associated with this permit action. See PTO 7904-R9 for a detailed permit history.
- 1.3 Compliance History: The Source Compliance Demonstration Period inspection was conducted on December 5, 2012. A revised fugitive I&M plan was submitted as required. No enforcement actions were issued.

2.0 ENGINEERING ANALYSIS

- 2.1 Equipment/Processes: Produced gas is compressed to 450 psig using two stages of electrically-driven compressors. It is then dehydrated by a glycol unit and chilled using a refrigeration unit where liquefied petroleum gases (LPG) in the stream are separated from the process gas. A third stage compression (about 1,000 psig) sends the process gas to the "Grace" unit for CO₂ removal. The "Grace" unit uses semi-permeable membranes to remove the excess CO₂ fraction in the gas. Following this operation, the processed natural gas is delivered to the sales pipeline.
- 2.2 Emission Controls: The fugitive hydrocarbon components associated with the Grace unit are subject to Rule 331 and the requirements of the facility Fugitive I&M Plan.
- 2.3 Emission Calculations: The only emissions associated with this permit are the emission reductions from the fugitive hydrocarbon components associated with the equipment that was removed from service: 119 valves (gas service) and 493 flanges (gas service). Emissions from these components are based on emission factors pursuant to District P&P 6100.061 (*Determination of Fugitive Hydrocarbon Emissions at Oil and Gas Facilities Through the Use of Facility Component Counts - Modified for Revised ROC Definition*). The total emission reduction is 12.03 lb/day and 2.2 tpy

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ROC. These reduced components and associated emissions are reflected in Tables 5.0-5.4 of this permit.

2.4 Emission Factors: The District P&P 6100.061 emission factors are listed in Table 5.1-2.

2.4 Reasonable Worst Case Emission Scenario: Worst case emissions are based on facility operations occurring 24 hours/day, 365 days per year.

2.5 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 equipment is operated properly.

2.9 Monitoring Requirements: Monitoring of the equipment's operational limits are required to ensure that these are enforceable.

2.10 Recordkeeping and Reporting Requirements: The permit requires that the data which is monitored be recorded and reported to the District.

3.0 REEVALUATION REVIEW (not applicable)

4.0 REGULATORY REVIEW

4.1 Partial List of Applicable 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 309. Specific Contaminants
- 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
- Rule 810. Federal Prevention of Significant Deterioration

4.2 Rules Requiring Review: n/a.

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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 emission reductions associated with this permit constitute a P2 term. The NEI reduction is documented in the IDS tables in Attachment B.

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 District (revised November 16, 2000). Appendix A of District CEQA Guidelines specifically exempts minor modification of existing facilities involving no expansion of use. The project has no potential for causing a significant adverse environmental impact. 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 District's work efforts are assessed on a fee basis. The Project Code is *300500 (Oil and Gas Plant)*. See the *Fee Statement* Attachment for the fee calculations.

ATTACHMENT A
EMISSION CALCULATIONS

Table 5.1-1
Venoco Ellwood Oil&Gas Facility: PTO 13935
Operating Equipment Description

Equipment Category	Emissions Unit	APCD: IDS Equipment No.	Device Specifications				Usage Data			Maximum Load Schedule				Reference	
			Feed	Parameter S, ppmv	Size	Units	Capacity	Units	Load	hr	day	qtr	year		
Combustion - External	Heater Treater: H-201	290	NG	80	4.399	MMBtu/hr	4.399	MMBtu/hr	1.0	1	24	2190	8760	A	
	Heater Treater: H-202	289	NG	80	2.464	MMBtu/hr	2.464	MMBtu/hr	1.0	1	24	2190	8760		
	Heater Treater: H-203	291	NG	80	4.399	MMBtu/hr	4.399	MMBtu/hr	1.0	1	24	2190	8760		
	Process Heater: H-204	285	NG/Grace	239	25.000	MMBtu/hr	25.000	MMBtu/hr	1.0	1	24	2190	8760		
Combustion- Flare/TO	Thermal Oxidizer: H-205	288	NG/Waste *	variable	35.000	MMBtu/hr	35.000	MMBtu/hr	--	See page 2 of 8 for details.				B	
	Thermal Oxidizer: H-206	287	NG/Waste *	variable	30.000	MMBtu/hr	30.000	MMBtu/hr	--						
	Thermal Oxidizer: H-207	286	NG/Waste *	variable	9.500	MMBtu/hr	9.500	MMBtu/hr	--						
IC Engines	Emergency Standby DICE	9010	Diesel		509	bhp			1.0	1	2	5	20		
Oil Storage Tank	Oil Tank: T-202	283	Oil	RVP 4.8	35'd x 16'h	feet	6500	bbl/day	--	See spreadsheets in Section 10.2 in APCD PTO 7904-R7				C	
	Oil Tank: T-203	6477	Oil	4.8	35'd x 16'h	feet	6500	bbl/day	--						
	Oil Tank: T-204	284	Oil	4.8	30'd x 24' h	feet	1000	bbl/day	--						
	EB Tank: T-101	8002	HC	1.5	12'd x 20' h	feet	403	bbl/day	--						
Pigging Equipmt.	Receiver. Oil emulsion	9200	Oil	psig 1	0.33'd x 4.5'l	feet	1.13	acf*	--	5	5	240	960	D	
	Receiver. Utility	9200	Gas or oil	1	0.33'd x 4.5'l	feet	1.13	acf*	--	10	10	30	120		
	Receiver. Produced Gas	9200	Gas	1	0.33'd x 4.5'l	feet	1.13	acf*	--	10	10	30	120		
	Launcher: Seep Gas	9337	Gas	1	0.33'd x 4.5'l	feet	1.13	acf*	--	1	1	26	104		
										* - includes a 4.33' long pipe at each end of pig)					
Sump/Wastewater Tanks	Sump Tank: S-202	9327	w/w	Service sec/VRS	6.5' dia	feet	33.18	sq. ft.	--	1	24	2190	8760	E	
	Wash Tank: TK-201	106004	w/w	sec/VRS	30.0' dia	feet	706.86	sq. ft.	--	1	24	2190	8760		
	Oil Sump S-203	9330	oil		7' dia	feet	38.48	sq.ft	--	1	24	2190	8760		
Loading Rack	Rack - LPG/NGL	8003	LPG	balanced	127	psia	20.00	1000 gal/hr	--	1	6	250	1000	F	
	Rack - Emulsion Breaker	8002	HC Liq.	submerged	403	bbl/day	6.72	1000 gal/hr	--	1	3	4	14		
Fugitive Components															
<i>Gas/Light Liquid Service</i>															
	Valves: Accessible	297	Gas/Lt.liq	--	3,488	comp-lp	3,488	comp-lp	--	1	24	2190	8760	G	
	Valves: Inaccessible	310	Gas/Lt.liq	--	4	comp-lp	4	comp-lp	--	1	24	2190	8760		
	Valves: Unsafe	9118	Gas/Lt.liq	--	6	comp-lp	6	comp-lp	--	1	24	2190	8760		
	Connections: Accessible	300	Gas/Lt.liq	--	19,244	comp-lp	19,244	comp-lp	--	1	24	2190	8760		
	Connections: Inaccessible	312	Gas/Lt.liq	--	2,327	comp-lp	2,327	comp-lp	--	1	24	2190	8760		
	Connections: Unsafe	9120	Gas/Lt.liq	--	78	comp-lp	78	comp-lp	--	1	24	2190	8760		
	Compressor Seal	9121	Gas/Lt.liq	--	20	comp-lp	20	comp-lp	--	1	24	2190	8760		
	Pres. Relief Valve: Accessibl	9122	Gas/Lt.liq	--	74	comp-lp	74	comp-lp	--	1	24	2190	8760		
	Pres. Relief Valve: Inaccessi	9123	Gas/Lt.liq	--	2	comp-lp	2	comp-lp	--	1	24	2190	8760		
	Pressure Relief Valve: Unsaf	N/A	Gas/Lt.liq	--	-	comp-lp	-	comp-lp	--	1	24	2190	8760		
	Pump Seal	9125	Gas/Lt.liq	--	10	comp-lp	10	comp-lp	--	1	24	2190	8760		
					sub-total =	25,253		25,253	comp-lp						
<i>Oil Service</i>															
	Valves: Accessible	298	Oil	--	516	comp-lp	516	comp-lp	--	1	24	2190	8760		G
	Connections: Accessible	301	Oil	--	2,617	comp-lp	2,617	comp-lp	--	1	24	2190	8760		
	Connections: Unsafe	N/A	Oil	--	-	comp-lp	-	comp-lp	--	1	24	2190	8760		
	Pres. Relief Valve: Accessibl	9127	Oil	--	-	comp-lp	-	comp-lp	--	1	24	2190	8760		
	Pump Seal	9128	Oil	--	7	comp-lp	7	comp-lp	--	1	24	2190	8760		
					sub-total =	3,140		3,140							
Solvent/coatings Usage	Cleaning/Degreasing*	9521	solvent/coating	--	1,500	gal/yr	125	gal/month	--	1	8	2190	8760		

* -- The usage of solvent/coating is estimated

Table 5.1-1
 Venoco Ellwood Oil&Gas Facility: PTO 13935
 Operating Equipment Description

Equipment Category	Emissions Unit	Device Specifications				Usage Data				Maximum Load Schedule				Reference
		APCD: IDS Equipment No.	Fuel	Parameter	Size	Units	Capacity	Units	Load	hr	day	qtr	year*	
Combustion - Flare/TO			Gas	ppmv										
H-205	Planned - Pilot Gas	***	PUC	205	0.000	MMBtu/hr	0.000	MMBtu/hr	--	0	0	0	0	B
	Planned	***	Various	205	35.000	MMBtu/hr	35.000	MMBtu/hr	--	1	24	1443	5771	
	Unplanned	***	Various	15,000	35.000	MMBtu/hr	35.000	MMBtu/hr	--	0	0	0	0	
H-206 ¹	Planned - Pilot Gas	***	PUC	205	0.340	MMBtu/hr	0.340	MMBtu/hr	--	1	24	2190	8760	B
	Planned	***	Various	205	220.000	MMBtu/hr	30.000	MMBtu/hr	--	0.06	24	1443	5771	
	Unplanned	***	Various	15,000	220.000	MMBtu/hr	30.000	MMBtu/hr	--	0	0	0	0	
H-207 ¹	Planned - Pilot Gas	***	PUC	205	1.000	MMBtu/hr	1.000	MMBtu/hr	--	1	24	2190	8760	B
	Planned	***	Various	205	30.000	MMBtu/hr	9.500	MMBtu/hr	--	0.48	24	1443	5771	
	Unplanned	***	Various	15,000	30.000	MMBtu/hr	9.500	MMBtu/hr	--	0	0	0	0	
Combined Units: H-205/206/207	Planned - Pilot Gas	***	PUC	205	1.340	MMBtu/hr	1.340	MMBtu/hr	--	1	24	2190	8760	B
	Planned	***	Various	205	35.000	MMBtu/hr	35.000	MMBtu/hr	--	1	24	1443	5771	
	Unplanned	***	Various	15,000	285.000	MMBtu/hr	74.500	MMBtu/hr	--	0	0	0	0	

1. These thermal oxidizers are not permitted to incinerate Lo-Cat System exhaust.

* -- The hours listed do not constitute any 'hourly' operational limits: the numbers are merely used to compute emissions

-- Annual hours of operation for the combined units is based on a total heat input of 213,734 MMBtu/year for all planned flaring minus 11,738 MMBtu/year of planned pilot gas flaring.

Table 5.1-2
 Venoco Ellwood Oil&Gas Facility: PTO 13935
 Equipment Emission Factors

Equipment Category	Emissions Unit	APCD: IDS Equipment No.	Emission Factors							Units	Reference		
			NOx	ROC	CO	SOx	PM	PM10	CO2				
Combustion - External	Heater Treater: H-201	290	0.098	0.005	0.082	0.012	0.007	0.007	190.020	lb/MMBtu	A		
	Heater Treater: H-202	289	0.098	0.005	0.082	0.012	0.007	0.007	190.020	lb/MMBtu			
	Heater Treater: H-203	291	0.098	0.005	0.082	0.012	0.007	0.007	190.020	lb/MMBtu			
	Process Heater: H-204	285	0.036	0.005	0.297	0.037	0.007	0.007	190.020	lb/MMBtu			
Combustion- Flare/TO	Thermal Oxidizer: H-205	288	See page 4 of 8 for details.							lb/MMBtu	B		
	Thermal Oxidizer: H-206	287								lb/MMBtu			
	Thermal Oxidizer: H-207	286								lb/MMBtu			
IC Engines	Emergency Standby DICE	9010	14.100	1.120	3.000	0.006	1.000	1.000	556.580	g/bhp-hr			
Oil Storage Tank	Oil Tank: T-202	283	See spreadsheets in Section 10.2							bb/yr	C		
	Oil Tank: T-203	6477								bb/yr			
	Oil Tank: T-204	284								bb/yr			
	EB Tank: T-101	8002								bb/yr			
Pigging Equipmt.	Receiver: Oil emulsion	9200	-	0.0759	-	-	-	-	-	lb ROC/acf-event	D		
	Receiver: Utility	9200	-	0.0759	-	-	-	-	-	lb ROC/acf-event			
	Receiver: Produced Gas	9200	-	0.0192	-	-	-	-	-	lb ROC/acf-event			
	Launcher: Seep Gas	9337	-	0.0192	-	-	-	-	-	lb ROC/acf-event			
Sump/Wastewater Tanks	Sump Tank: S-202	9327	-	0.001	-	-	-	-	-	lb/ft2 - day	E		
	Wash Tank: TK-201	106004	-	0.001	-	-	-	-	-	lb/ft2 - day			
	Oil Sump S-203	9330	-	0.018	-	-	-	-	-	lb/ft2 - day			
Loading Rack	Rack - LPG/NGL	8003	-	0.024	-	-	-	-	-	lb/1000 gallons	F		
	Rack - Emulsion Breaker	8002	-	1.079	-	-	-	-	-	lb/1000 gallons			
Fugitive Components													
Gas/Light Liquid Service	Valves: Accessible	297	-	0.080	-	-	-	-	-	lb/clp-day	G		
	Valves: Inaccessible	310	-	0.080	-	-	-	-	-	lb/clp-day			
	Valves: Unsafe	9118	-	0.402	-	-	-	-	-	lb/clp-day			
	Connections: Accessible	300	-	0.005	-	-	-	-	-	lb/clp-day			
	Connections: Inaccessible	312	-	0.005	-	-	-	-	-	lb/clp-day			
	Connections: Unsafe	9120	-	0.025	-	-	-	-	-	lb/clp-day			
	Compressor Seal	9121	-	0.432	-	-	-	-	-	lb/clp-day			
	Pres. Relief Valve: Accessible	9122	-	0.139	-	-	-	-	-	lb/clp-day			
	Pres. Relief Valve: Inaccessibl	9123	-	0.139	-	-	-	-	-	lb/clp-day			
	Pressure Relief Valve: Unsafe	N/A	-	0.696	-	-	-	-	-	lb/clp-day			
	Pump Seal	9125	-	0.521	-	-	-	-	-	lb/clp-day			
	Oil Service	Valves: Accessible	298	-	0.028	-	-	-	-	-		lb/clp-day	G
		Connections: Accessible	301	-	0.005	-	-	-	-	-		lb/clp-day	
Connections: Unsafe		N/A	-	0.023	-	-	-	-	-	lb/clp-day			
Pres. Relief Valve: Accessible		9127	-	0.115	-	-	-	-	-	lb/clp-day			
Pump Seal		9128	-	0.086	-	-	-	-	-	lb/clp-day			
Solvent/coatings Usage	Cleaning/Degreasing	9521	-	250	-	-	-	-	-	g/l			

Table 5.1-2
 Venoco Elwood Oil&Gas Facility: PTO 13935
 Equipment Emission Factors

Equipment Category	Emissions Unit	APCD: IDS Equipment No.	Emission Factors							Units	Reference
			NOx	ROC	CO	SOx	PM	PM10	CO2		
Combustion - Flare/TO H-205	Planned - Pilot Gas	***	0.0400	0.0027	0.1000	0.0307	0.0140	0.0140	190.020	lb/MMBtu	B
	Planned	***	0.0400	0.0027	0.1000	0.0307	0.0140	0.0140	190.020	lb/MMBtu	
	Unplanned	***								lb/MMBtu	
H-206	Planned - Pilot Gas	***	0.0700	0.0030	0.3700	0.0307	0.0140	0.0140	190.020	lb/MMBtu	B
	Planned	***	0.0980	0.0054	0.3700	0.0307	0.0140	0.0140	190.020	lb/MMBtu	
	Unplanned	***								lb/MMBtu	
H-207	Planned - Pilot Gas	***	0.0700	0.0030	0.3700	0.0307	0.0140	0.0140	190.020	lb/MMBtu	B
	Planned	***	0.0980	0.0054	0.3700	0.0307	0.0140	0.0140	190.020	lb/MMBtu	
	Unplanned	***								lb/MMBtu	
Combined Units:	Planned - Pilot Gas	***								lb/MMBtu	B
	Planned	***								lb/MMBtu	
	Unplanned	***								lb/MMBtu	

Table 5.1-3
 Venoco Ellwood Oil&Gas Facility; PTO 13935
 Hourly and Daily Emissions

Equipment Category	Emissions Unit	APCD: IDS Equipment No.	NOx		ROC		CO		SOx		PM		PM10		CO2		Federal Enforceability	
			lbs/hr	lbs/day	lbs/hr	lbs/day	lbs/hr	lbs/day	lbs/hr	lbs/day	lbs/hr	lbs/day	lbs/hr	lbs/day	lbs/hr	lbs/day		
Combustion - External	Heater Treater: H-201	290	0.43	10.35	0.02	0.57	0.36	8.69	0.05	1.27	0.03	0.79	0.03	0.79	835.9	20061.6	FE	
	Heater Treater: H-202	289	0.24	5.80	0.01	0.32	0.20	4.87	0.03	0.71	0.02	0.44	0.02	0.44	468.2	11237.0	FE	
	Heater Treater: H-203	291	0.43	10.35	0.02	0.57	0.36	8.69	0.05	1.27	0.03	0.79	0.03	0.79	835.9	20061.6	FE	
	Process Heater: H-204	285	0.90	21.60	0.13	3.24	7.43	178.20	0.93	22.20	0.19	4.47	0.18	4.47	4750.5	114012.0	FE	
Combustion- Flare/TO	Thermal Oxidizer: H-205	288	See page 6 of 8 for details.														FE	
	Thermal Oxidizer: H-206	287															FE	
	Thermal Oxidizer: H-207	286															FE	
IC Engines	Emergency Standby DICE	9010	15.82	31.64	1.26	2.51	3.37	6.73	0.01	0.01	1.12	2.24	1.12	2.24	624.6	1249.11		
Oil Storage Tank	Oil Tank: T-202	283	-	-	0.27	6.50	-	-	-	-	-	-	-	-	-	-	A	
	Oil Tank: T-203	6477	-	-	0.27	6.50	-	-	-	-	-	-	-	-	-	-	A	
	Oil Tank: T-204	284	-	-	0.09	2.22	-	-	-	-	-	-	-	-	-	-	A	
	EB Tank: T-101	8002	-	-	sub-total =	0.63	15.22	-	-	-	-	-	-	-	-	-	A	
			-	-	0.05	1.29	-	-	-	-	-	-	-	-	-	-	FE	
Pigging Equipmt.	Receiver: Oil emulsion	9200	-	-	0.43	0.43	-	-	-	-	-	-	-	-	-	-	A	
	Receiver: Utility	9200	-	-	0.85	0.85	-	-	-	-	-	-	-	-	-	-	A	
	Receiver: Produced Gas	9200	-	-	0.22	0.22	-	-	-	-	-	-	-	-	-	-	A	
	Launcher: Seep Gas	9337	-	-	0.02	0.02	-	-	-	-	-	-	-	-	-	-	A	
Sump/Wastewater Tanks	Sump Tank: S-202	9327	-	-	0.00	0.03	-	-	-	-	-	-	-	-	-	-	A	
	Wash Tank: TK-201	106004	-	-	0.03	0.64	-	-	-	-	-	-	-	-	-	-	A	
	Oil Sump S-203	9330	-	-	0.03	0.69	-	-	-	-	-	-	-	-	-	-	A	
Loading Rack	Rack - LPG/NGL	8003	-	-	0.48	2.88	-	-	-	-	-	-	-	-	-	-	A	
	Rack - Emulsion Breaker	8002	-	-	7.25	21.75	-	-	-	-	-	-	-	-	-	-	FE	
Fugitive Components																		
Gas/Light Liquid Service	Valves: Accessible	297	-	-	11.69	280.46	-	-	-	-	-	-	-	-	-	-	A	
	Valves: Inaccessible	310	-	-	0.01	0.32	-	-	-	-	-	-	-	-	-	-	A	
	Valves: Unsafe	9118	-	-	0.10	2.41	-	-	-	-	-	-	-	-	-	-	A	
	Connections: Accessible	300	-	-	4.00	95.99	-	-	-	-	-	-	-	-	-	-	A	
	Connections: Inaccessible	312	-	-	0.48	11.61	-	-	-	-	-	-	-	-	-	-	A	
	Connections: Unsafe	9120	-	-	0.08	1.95	-	-	-	-	-	-	-	-	-	-	A	
	Pres. Relief Valve: Accessible	9121	-	-	0.36	8.64	-	-	-	-	-	-	-	-	-	-	A	
	Pres. Relief Valve: Inaccessible	9122	-	-	0.43	10.31	-	-	-	-	-	-	-	-	-	-	A	
	Pressure Relief Valve: Inaccessible	9123	-	-	0.01	0.28	-	-	-	-	-	-	-	-	-	-	A	
	Pressure Relief Valve: Unsafe	N/A	-	-	0.00	0.00	-	-	-	-	-	-	-	-	-	-	A	
	Pump Seal	9125	-	-	0.22	5.21	-	-	-	-	-	-	-	-	-	-	A	
				-	-	sub-total =	17.38	417.17	-	-	-	-	-	-	-	-	-	A
	Oil Service	Valves: Accessible	298	-	-	0.61	14.66	-	-	-	-	-	-	-	-	-	-	A
		Connections: Accessible	301	-	-	0.50	11.99	-	-	-	-	-	-	-	-	-	-	A
		Pres. Relief Valve: Accessible	N/A	-	-	0.00	0.00	-	-	-	-	-	-	-	-	-	-	A
Pressure Relief Valve: Accessible		9127	-	-	0.00	0.00	-	-	-	-	-	-	-	-	-	-	A	
Pump Seal		9128	-	-	0.03	0.60	-	-	-	-	-	-	-	-	-	-	A	
			-	-	sub-total =	1.14	27.26	-	-	-	-	-	-	-	-	-	A	
Solvent/coatings Usage*	Cleaning/Degreasing*	9521	-	-	1.09	8.68	-	-	-	-	-	-	-	-	-	-	N/A	

* -- Indicates this is an estimate of emissions and not a limit

Table 5.1-3
 Venoco Ellwood Oil&Gas Facility: PTO 13935
 Hourly and Daily Emissions

Equipment Category	Emissions Unit	APCD: IDS Equipment No.	NOx		ROC		CO		SOx		PM		PM10		CO2		Federal Enforceability	
			lbs/hr	lbs/day	lbs/hr	lbs/day	lbs/hr	lbs/day	lbs/hr	lbs/day	lbs/hr	lbs/day	lbs/hr	lbs/day	lbs/hr	lbs/day		
Combustion - Flare/TO																		
H-205	Planned - Pilot Gas	***	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	FE
	Planned	***	1.40	33.60	0.09	2.27	3.50	84.00	1.07	25.79	0.49	11.76	0.49	11.76	7165.9	171981.3		FE
	Unplanned	***	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	FE
H-206	Planned - Pilot Gas	***	0.02	0.57	0.00	0.02	0.13	3.02	0.01	0.25	0.00	0.11	0.00	0.11	69.61	1670.68		FE
	Planned	***	0.19	4.58	0.01	0.25	0.72	17.29	0.06	1.43	0.03	0.65	0.03	0.65	398.6	9567.1		FE
	Unplanned	***	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	FE
H-207	Planned - Pilot Gas	***	0.07	1.68	0.00	0.07	0.37	8.88	0.03	0.74	0.01	0.34	0.01	0.34	204.74	4913.75		FE
	Planned	***	0.44	10.64	0.02	0.59	1.67	40.16	0.14	3.33	0.06	1.52	0.06	1.52	925.8	22220.0		FE
	Unplanned	***	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	FE
Combined Units:	Planned - Pilot Gas	***	0.09	2.25	0.00	0.10	0.50	11.90	0.04	0.99	0.02	0.45	0.02	0.45	204.7	4913.8		FE
H-205/206/207	Planned	***	1.40	33.60	0.09	2.27	3.50	84.00	1.07	25.79	0.49	11.76	0.49	11.76	7165.9	171981.3		FE
	Unplanned	***	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	FE
	Worst-Case Flaring Scenario		1.49	35.85	0.10	2.36	4.00	95.90	1.12	26.78	0.51	12.21	0.51	12.21	7370.6	176895.1		FE

Notes:

- FE means federally enforceable
- A means APCD enforceable only
- NE means not enforceable

Table 5.1-4
Venoco Ellwood Oil&Gas Facility: PTO 13935
Annual Emissions

Equipment Category	Emissions Unit	APCD: IDS Equipment No.	NOx tpy	ROC tpy	CO tpy	SOx tpy	PM tpy	PM10 tpy	CO2 tpy	Federal Enforceability	
Combustion - External	Heater Treater: H-201	290	1.89	0.10	1.59	0.23	0.14	0.13	3661.23	FE	
	Heater Treater: H-202	289	1.06	0.06	0.89	0.13	0.08	0.08	2050.76	FE	
	Heater Treater: H-203	291	1.89	0.10	1.59	0.23	0.14	0.13	3661.23	FE	
	Process Heater: H-204	285	3.94	0.59	32.52	4.05	0.82	0.77	20807.19	FE	
Combustion- Flare/TO	Thermal Oxidizer: H-205	288	See page 8 of 8 for details.							FE	
	Thermal Oxidizer: H-206	287								FE	
	Thermal Oxidizer: H-207	286								FE	
IC Engines	Emergency Standby DICE	9010	0.16	0.01	0.03	0.00	0.01	0.01	6.25		
Oil Storage Tank	Oil Tank: T-202	283	-	1.19	-	-	-	-	-	A	
	Oil Tank: T-203	6477	-	1.19	-	-	-	-	-	A	
	Oil Tank: T-204	284	-	0.41	-	-	-	-	-	A	
	EB Tank: T-101	8002	-	2.79	-	-	-	-	-	A	
				-	0.24	-	-	-	-	-	FE
Pigging Equipmt.	Receiver: Oil emulsion	9200	-	0.04	-	-	-	-	-	A	
	Receiver: Utility	9200	-	0.01	-	-	-	-	-	A	
	Receiver: Produced Gas	9200	-	0.00	-	-	-	-	-	A	
	Launcher: Seep Gas	9337	-	0.00	-	-	-	-	-	A	
Sump/Wastewater Tanks	Sump Tank: S-202	9327	-	0.01	-	-	-	-	-	A	
	Wash Tank: TK-201	106004	-	0.12	-	-	-	-	-	A	
	Oil Sump S-203	9330	-	0.13	-	-	-	-	-	A	
Loading Rack	Rack - LPG/NGL	8003	-	0.24	-	-	-	-	-	A	
	Rack - Emulsion Breaker	8002	-	0.05	-	-	-	-	-	FE	
Fugitive Components	<i>Gas/Light Liquid Service</i>										
	Valves: Accessible	297	-	51.18	-	-	-	-	-	-	A
	Valves: Inaccessible	310	-	0.06	-	-	-	-	-	-	A
	Valves: Unsafe	9118	-	0.44	-	-	-	-	-	-	A
	Connections: Accessible	300	-	17.52	-	-	-	-	-	-	A
	Connections: Inaccessible	312	-	2.12	-	-	-	-	-	-	A
	Connections: Unsafe	9120	-	0.36	-	-	-	-	-	-	A
	Pres. Relief Valve: Accessible	9121	-	1.58	-	-	-	-	-	-	A
	Pres. Relief Valve: Inaccessible	9122	-	1.88	-	-	-	-	-	-	A
	Pressure Relief Valve: Inaccessible	9123	-	0.05	-	-	-	-	-	-	A
	Pressure Relief Valve: Unsafe	N/A	-	0.00	-	-	-	-	-	-	A
	Pump Seal	9125	-	0.95	-	-	-	-	-	-	A
				sub-total =	76.13						A
	<i>Oil Service</i>										
	Valves: Accessible	298	-	2.68	-	-	-	-	-	-	A
	Connections: Accessible	301	-	2.19	-	-	-	-	-	-	A
	Pres. Relief Valve: Accessible	N/A	-	0.00	-	-	-	-	-	-	A
	Pressure Relief Valve: Accessible	9127	-	0.00	-	-	-	-	-	-	A
	Pump Seal	9128	-	0.11	-	-	-	-	-	-	A
				sub-total =	4.97						A
Solvent/coatings Usage*	Cleaning/Degreasing	9521		1.56	-	-	-	-	-	N/A	

* -- Indicates this is an estimate of emissions and not a limit

Table 5.1-4
 Venoco Ellwood Oil&Gas Facility: PTO 13935
 Annual Emissions

Equipment Category	Emissions Unit	APCD: IDS Equipment No.	NOx tpy	ROC tpy	CO tpy	SOx tpy	PM tpy	PM10 tpy	CO2 tpy	Federal Enforceability
Combustion - Flare/TO										
H-205	Planned - Pilot Gas	***	0.00	0.00	0.00	0.00	0.00	0.00	0.00	FE
	Planned	***	4.04	0.27	10.10	3.10	1.41	1.41	20678.25	FE
	Unplanned	***	0.00	0.00	0.00	0.00	0.00	0.00	0.00	FE
H-206	Planned - Pilot Gas	***	0.10	0.00	0.55	0.05	0.02	0.02	304.90	FE
	Planned	***	0.55	0.03	2.08	0.17	0.08	0.08	17724.22	FE
	Unplanned	***	0.00	0.00	0.00	0.00	0.00	0.00	0.00	FE
H-207	Planned - Pilot Gas	***	0.31	0.01	1.62	0.13	0.06	0.06	896.76	FE
	Planned	***	1.28	0.07	4.83	0.40	0.18	0.18	5612.67	FE
	Unplanned	***	0.00	0.00	0.00	0.00	0.00	0.00	0.00	FE
Combined Units: H-205/206/207	Planned - Pilot Gas	***	0.41	0.02	2.17	0.18	0.08	0.08	1201.66	FE
	Planned	***	4.04	0.27	10.10	3.10	1.41	1.41	20678.25	FE
	Unplanned	***	0.00	0.00	0.00	0.00	0.00	0.00	0.00	FE
	Worst-Case Flaring Scenario	***	4.45	0.29	12.27	3.28	1.50	1.50	21879.91	FE

Notes:

- FE means federally enforceable
- A means APCD enforceable only

Table 5.2
Venoco Ellwood Oil&Gas Facility: PTO 13935
Total Permitted Facility Emissions

A. HOURLY (lb/hr)

Equipment Category	NOx	ROC	CO	SOx	PM	PM10	CO2
Combustion - External	2.00	0.20	8.35	1.06	0.27	0.25	6890.51
Combustion - Flare/TO	1.49	0.10	4.00	1.12	0.51	0.51	7370.63
IC Engines	15.82	1.26	3.37	0.01	1.12	1.12	624.56
Oil Storage Tank	-	0.68	-	-	-	-	-
Pigging Equipment	-	1.52	-	-	-	-	-
Sumps/W-W Tanks	-	0.06	-	-	-	-	-
Loading Rack	-	7.73	-	-	-	-	-
Fug.Comp. -- Gas Service	-	17.38	-	-	-	-	-
Fug. Comp. -- Oil Service	-	1.14	-	-	-	-	-
solvent/coating	-	1.09	-	-	-	-	-
Totals =	19.32	31.14	15.71	2.18	1.90	1.88	14885.69

B. DAILY (lb/day)

Equipment Category	NOx	ROC	CO	SOx	PM	PM10	CO2
Combustion - External	48.10	4.69	200.46	25.44	6.48	6.48	165372.13
Combustion - Flare/TO	35.85	2.36	95.90	26.78	12.21	12.21	176895.06
IC Engines	31.64	2.51	6.73	0.01	2.24	2.24	1249.11
Oil Storage Tank	-	16.51	-	-	-	-	-
Pigging Equipment	-	1.52	-	-	-	-	-
Sumps/W-W Tanks	-	0.37	-	-	-	-	-
Loading Rack	-	24.63	-	-	-	-	-
Fug.Comp. -- Gas Service	-	417.17	-	-	-	-	-
Fug. Comp. -- Oil Service	-	27.26	-	-	-	-	-
solvent/coating	-	8.68	-	-	-	-	-
Totals =	115.59	505.71	303.09	52.23	20.94	20.94	343516.30

C. ANNUAL (ton/yr)

Equipment Category	NOx	ROC	CO	SOx	PM	PM10	CO2
Combustion - External	8.78	0.86	36.58	4.64	1.18	1.11	30180.41
Combustion - Flare/TO	4.45	0.29	12.27	3.28	1.50	1.50	21879.91
IC Engines	0.16	0.01	0.03	0.00	0.01	0.01	6.25
Oil Storage Tank	-	3.03	-	-	-	-	-
Pigging Equipment	-	0.05	-	-	-	-	-
Sumps/W-W Tanks	-	0.25	-	-	-	-	-
Loading Rack	-	0.29	-	-	-	-	-
Fug.Comp. -- Gas Service	-	76.13	-	-	-	-	-
Fug. Comp. -- Oil Service	-	4.97	-	-	-	-	-
solvent/coating	-	1.56	-	-	-	-	-
Totals =	13.39	87.45	48.89	7.92	2.69	2.62	52066.57

Table 5.3
 Venoco Ellwood Oil&Gas Facility: PTO 13935
 Federal Potential to Emit Information

A. HOURLY (lb/hr)

Equipment Category	NOx	ROC	CO	SOx	PM	PM10	CO2
Combustion - External	2.00	0.20	8.35	1.06	0.27	0.25	6890.51
Combustion - Flare/TO	1.49	0.10	4.00	1.12	0.51	0.51	7370.63
IC Engines	15.82	1.26	3.37	0.01	1.12	1.12	624.56
Oil Storage Tank	-	0.68	-	-	-	-	-
Pigging Equipment	-	0.00	-	-	-	-	-
Sumps/W-W Tanks	-	0.00	-	-	-	-	-
Loading Rack	-	7.73	-	-	-	-	-
Fug.Comp. -- Gas Service	-	-	-	-	-	-	-
Fug. Comp. -- Oil Service	-	-	-	-	-	-	-
solvent/coating	∓	0.00	∓	∓	∓	∓	∓
Totals =	19.32	9.96	15.71	2.18	1.90	1.88	14885.69

B. DAILY (lb/day)

Equipment Category	NOx	ROC	CO	SOx	PM	PM10	CO2
Combustion - External	48.10	4.69	200.46	25.44	6.48	6.48	165372.13
Combustion - Flare/TO	35.85	2.36	95.90	26.78	12.21	12.21	176895.06
IC Engines	31.64	2.51	6.73	0.01	2.24	2.24	1249.11
Oil Storage Tank	-	16.51	-	-	-	-	-
Pigging Equipment	-	0.00	-	-	-	-	-
Sumps/W-W Tanks	-	0.00	-	-	-	-	-
Loading Rack	-	24.63	-	-	-	-	-
Fug.Comp. -- Gas Service	-	-	-	-	-	-	-
Fug. Comp. -- Oil Service	-	-	-	-	-	-	-
solvent/coating	∓	0.00	∓	∓	∓	∓	∓
Totals =	115.59	50.71	303.09	52.23	20.94	20.94	343516.30

C. ANNUAL (ton/yr)

Equipment Category	NOx	ROC	CO	SOx	PM	PM10	CO2
Combustion - External	8.78	0.86	36.58	4.64	1.18	1.11	30180.41
Combustion - Flare/TO	4.45	0.29	12.27	3.28	1.50	1.50	21879.91
IC Engines	0.16	0.01	0.03	0.00	0.01	0.01	6.25
Oil Storage Tank	-	3.03	-	-	-	-	-
Pigging Equipment	-	0.00	-	-	-	-	-
Sumps/W-W Tanks	-	0.00	-	-	-	-	-
Loading Rack	-	0.29	-	-	-	-	-
Fug.Comp. -- Gas Service	-	-	-	-	-	-	-
Fug. Comp. -- Oil Service	-	-	-	-	-	-	-
solvent/coating	-	0.00	-	-	-	-	-
Totals =	13.39	4.48	48.89	7.92	2.69	2.62	52066.57

ATTACHMENT B

IDS TABLES

PERMIT POTENTIAL TO EMIT

	NO _x	ROC	CO	SO _x	PM	PM ₁₀
lb/day	--	--	--	--	--	--
lb/hr	--	--	--	--	--	--
TPQ	--	--	--	--	--	--
TPY	--	--	--	--	--	--

FACILITY POTENTIAL TO EMIT

	NO _x	ROC	CO	SO _x	PM	PM ₁₀
lb/day	115.59	519.85	303.09	52.23	20.94	20.94
lb/hr						
TPQ						
TPY	13.39	90.02	48.89	7.92	2.69	2.62

Notes:

- (1) Emissions in these tables are from IDS.
- (2) Because of rounding, values in these tables shown as 0.00 are less than 0.005, but greater than zero.

**Venoco Ellwood Oil&Gas Facility: ATC 13689-01
Facility #0028 NEI-90**

I. This PTO's "I" (NEI-90)

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr										
ATC 13689-01	TBD	0.00	0.00	2.11	0.38	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
ATC 8262	Dec '91	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ATC 9217-01	Sept '94	0.00	0.00	0.00	0.00	158.40	28.90	0.00	0.00	5.30	1.00	5.30	1.00
ATC 9218	Feb '96	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ATC 9473-06	Apr '99	57.99	4.40	2.50	0.20	214.90	39.30	38.50	3.40	13.10	1.20	13.10	1.20
ATC 10022	Dec '98	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ATC/PTO 10537	May '99	0.00	0.00	4.20	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ATC 10749	Nov '02	0.00	0.00	3.54	0.65	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ATC 10941	Jan '03	48.72	4.82	4.18	0.69	215.39	31.17	21.85	2.16	9.74	0.96	9.74	0.96
ATC 11106	Sep '04	0.00	0.00	1.31	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ATC 11169	Sep '04	0.00	1.84	0.00	0.08	0.00	11.89	0.00	0.81	0.00	0.37	0.00	0.37
ATC 11579	July '05	0.00	0.00	15.97	2.91	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ATC-PTO 12886	Nov '08	0.00	0.00	7.49	1.37	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ATC Mod 13420 01	Oct '10	47.19	6.52	3.02	0.41	135.31	19.46	30.05	3.88	13.70	1.76	13.70	1.76
ATC 13689	Sept '11	0.00	0.00	0.11	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Totals		153.90	17.58	42.32	6.41	724.00	130.72	90.40	10.25	41.84	5.29	41.84	5.29

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	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
ATC 10941	Jan '03	56.45	4.40	2.42	0.20	365.30	39.30	25.32	3.40	11.29	1.20	11.29	1.20
PTO Mod 7904 02	Jun '08	0.00	0.19	0.00	0.01	0.00	1.21	0.00	0.08	0.00	0.04	0.00	0.04
ATC/PTO 12839	July '08	1.63	0.21	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
PTO Mod 7904 03	Oct '09	0.00	0.27	0.00	0.04	0.00	0.18	0.00	0.12	0.00	0.06	0.00	0.06
ATC Mod 13420 01	Oct '10	69.80	9.46	2.99	0.41	423.95	55.54	29.55	3.91	13.47	1.78	13.47	1.78
Totals		127.88	14.53	5.41	0.66	789.25	96.23	54.87	7.51	24.76	3.08	24.76	3.08

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										
None		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Totals		0.00											

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. Calculate 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	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
PTO "I" (see P1)	0.00	0.00	2.11	0.38	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P1	153.90	17.58	42.32	6.41	724.00	130.72	90.40	10.25	41.84	5.29	41.84	5.29
P2	127.88	14.53	5.41	0.66	789.25	96.23	54.87	7.51	24.76	3.08	24.76	3.08
D	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
FNEI-90	26.02	3.05	39.02	6.13	0.00	34.49	35.53	2.74	17.08	2.21	17.08	2.21

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.

ATTACHMENT C
FEE STATEMENT

FEE STATEMENT

PTO No. 13935

FID: 00028 Ellwood Onshore Facility / SSID: 01063



Permit Fee

Admin Change 395.00

Fee Statement Grand Total = \$395

Notes:

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

