



**Permit to Operate 12354**

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EQUIPMENT OWNER:

BreitBurn Energy Company LP

300000

EQUIPMENT OPERATOR:

BreitBurn Energy Company LP

EQUIPMENT LOCATION:

Newlove Lease, Orcutt Hill Oil Field, Santa Barbara County, California

STATIONARY SOURCE/FACILITY:

BreitBurn Energy- Orcutt Hill  
Newlove Lease

SSID: 02667

FID: 03321

EQUIPMENT DESCRIPTION:

1. Wastewater tank, 1,000 barrel capacity, 21.5 feet diameter by 16 feet high, connected to a vapor recovery system.

CONDITIONS:

**9.A Standard Administrative Conditions**

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

**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.

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- (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.

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*]

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- A.6 **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.7 **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 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.8 **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.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*]
- A.10 **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 entry by the permittee and shall be made available to the APCD upon request. [*Re: APCD Rule 1303.D.1.f, 40CFR70.6(a)(3)(ii)(A)*]

- A.11 **Conditions for Permit Reopening.** The permit shall be reopened and revised for cause under any of the following circumstances:
- (a) Additional Requirements: If additional applicable requirements (e.g., NSPS or MACT) become applicable to the source which has an unexpired permit term of three (3) or more years, the permit shall be reopened. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. However, no such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended. All such reopenings 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 reopenings 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 reopenings shall be made as soon as practicable.

Administrative procedures to reopen and revise/voke/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.12 **Grounds for Revocation.** Failure to abide by and faithfully comply with this permit or any Rule, Order, or Regulation may constitute grounds for the APCD to petition for permit revocation pursuant to California Health & Safety Code Section 42307 *et seq.*

**9.B. Generic Conditions**

- 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.3 **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]

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

This condition supersedes the same numbered condition in PTO/Part-70 Permit 8226-R7. Tables 5.1-1 through 5.1-4 in PTO/Part-70 Permit 8226-R7 are also superseded by Tables 5.1-1 through 5.1-4 of this permit.

**C.3 Wastewater Tanks, Sumps and Pits.** The following equipment are included in this emissions category:

Dev No	Equipment Name; Capacity, Size
110332	Wastewater Tank, 1,000 bbl capacity
101173	Wastewater Pit
101174	Wastewater Pit
101175	Wastewater Pit
101177	Wastewater Pit
101178	Wastewater Pit
101184	Wastewater Pit
101185	Wastewater Pit

- (a) Emission Limits: Mass emission for wastewater tanks (Dev No 110332) listed above shall not exceed the limits listed in Tables 5.1-3 and 5.1-4. Emissions from the pits are not federally-enforceable.
- (b) Operational Limits: All process operations for the equipment listed in this section shall meet the requirements of APCD Rules 325, 343 and 344. Compliance with these limits shall be assessed through compliance with the monitoring, recordkeeping and reporting conditions in this permit.  
  
Pursuant to Rule 343, Sections D, E, F and G, the permittee shall use a control device, approved in advance by the APCD, when degassing or purging any stationary tanks, vessels, or containers which process odorous sulfur compounds. Except for emergency cases, the Control Officer shall be notified in writing at least two weeks prior to the start of the emptying operation for the purpose of degassing any above-ground tank subject to this rule.
- (c) 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:
  - (i) For all degassing events, monitor the volume purged, characteristics of the vapor purged, and control device/method used.
- (d) 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:
  - (i) The permittee shall maintain a log of all degassing events, and record all the parameters listed in Section 9.C.3.(c)(i) above.

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- (e) **Reporting:** On a semi-annual basis, a report detailing the previous six-month's activities shall be provided to the APCD. The report must list all data required by the *Semi-Annual Compliance Verification Reports* condition of this permit.

[Re: 40 CFR 70.6, APCD Rules 325, 343, 344 and 1303.D.1.f]

**9.D APCD-Only Conditions**

D.1 **Permit Activation.** All aspects of this permit are enforceable by the APCD and the State of California upon the issuance date stamped below. The Part 70 aspects of this permit are not final until:

- (a) The USEPA has provided written comments to the APCD and these comments require no modification to this permit. The APCD will issue a letter stating that this permit is a final Part 70 permit. The effective date that this permit will be considered a final Part 70 permit will be the date stamped on the APCD's letter.
- (b) After the USEPA has provided the APCD written comments that require a modification to this permit, the APCD will modify this permit to address the USEPA's comments and issue the Part 70 permit as final. The re-issued permit will supersede this permit in its entirety.



AIR POLLUTION CONTROL OFFICER

JAN 10 2008

DATE

Note:

1. When issued, this permit supersedes ATC 12354 issued October 2, 2007.
2. Next Reevaluation Due: March 2009

Attachment: Permit Evaluation for PTO 12354

Table 5.1-1  
BreitBurn New/ove Lease: Permit to Operate 12354  
Operating Equipment Description

Equipment Category	Description	Dev No	Device Specifications				Usage Data				Maximum Operating Schedule			
			Feed	Parameter	Size	Units	Capacity	Units	Load	hr	day	qtr	year	References
													TVP	
Tanks	Wash Tank	002973	O/W	2,420	3,000 bbls	1,100 bbl/day	1.0	1.0	24	2,190	8,760	A		
	Wash Tank	002978	O/W	2,420	3,000 bbls	1,100 bbl/day	1.0	1.0	24	2,190	8,760	A		
	Wash Tank	002979	O/W	2,420	3,000 bbls	1,100 bbl/day	1.0	1.0	24	2,190	8,760	A		
	Crude Tank	002974	Oil	2,420	1,000 bbls	1,100 bbl/day	1.0	1.0	24	2,190	8,760	A		
	Wastewater Tank	110332	Water	2,420	1,000 bbls	--	1.0	1.0	24	2,190	8,760	B		
	Wastewater Tank	107475	Water	2,420	10,000 bbls	--	1.0	1.0	24	2,190	8,760	B		
Pits and Sumps	Well Cellars	003041	O/W	Primary	1,044 ft <sup>2</sup>	--	1.0	1.0	24	2,190	8,760	B		
	Pits	Note A	O/W	Secondary	75 ft <sup>2</sup>	--	1.0	1.0	24	2,190	8,760	B		
	Spill Catch Pan	101177	O/W	Primary	5 ft <sup>2</sup>	--	1.0	1.0	24	2,190	8,760	B		
Fugitive Components	Valves, Connections, etc	002980	--	--	56 wells	--	1.0	1.0	24	2,190	8,760	C		
	Pumps/Compressors/Wellheads	003042	--	--	56 wells	--	1.0	1.0	24	2,190	8,760	C		

Note A: Device Number Pits are 101173, 101174, 101175, 101178, 101184, 101185

**Table 5.1-2  
BreitBurn Newlove Lease: Permit to Operate 12354  
Equipment Emission Factors**

Equipment Category	Description	Dev No	Emission Factors							Units
			NO <sub>x</sub>	ROC	CO	SO <sub>x</sub>	PM	PM <sub>10</sub>		
Tanks	Wash Tank	002973	--	--	--	--	--	--	--	lb/ft <sup>2</sup> -day
	Wash Tank	002978	--	--	--	--	--	--	--	lb/ft <sup>2</sup> -day
	Wash Tank	002979	--	--	--	--	--	--	--	lb/ft <sup>2</sup> -day
	Crude Tank	002974	--	--	--	--	--	--	--	lb/ft <sup>2</sup> -day
	Wastewater Tank	110332	--	0.0006	--	--	--	--	--	lb/ft <sup>2</sup> -day
	Wastewater Tank	107475	--	0.0006	--	--	--	--	--	lb/ft <sup>2</sup> -day
Pits and Sumps	Well Cellars	003041	--	0.0282	--	--	--	--	--	lb/ft <sup>2</sup> -day
	Pits	Note A	--	0.0126	--	--	--	--	--	lb/ft <sup>2</sup> -day
	Spill Catch Pan	101177	--	0.0941	--	--	--	--	--	lb/ft <sup>2</sup> -day
Fugitive Components	Valves, Connections, etc	002980	--	--	--	--	--	--	--	--
	Pumps/Compressors/Wellheads	003042	--	--	--	--	--	--	--	--

See attached worksheets for emission factors.

Table 5.1-3  
BreitBurn Newlove Lease: Permit to Operate 12354  
Hourly and Daily Emissions

Equipment Category	Description	Dev No	NO <sub>x</sub>		ROC		CO		SO <sub>x</sub>		PM		PM <sub>10</sub>		Enforceability Basis	
			lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	Type	Basis
Tanks	Wash Tank	002973	..	..	0.00	0.04	..	..	..	..	..	..	..	..	FE	PTO 8240R6
	Wash Tank	002976	..	..	0.00	0.04	..	..	..	..	..	..	..	..	FE	ATC 6416
	Wash Tank	002979	..	..	0.00	0.04	..	..	..	..	..	..	..	..	FE	ATC 6416
	Crude Tank	002974	..	..	0.02	0.58	..	..	..	..	..	..	..	..	FE	ATC 6416
	Wastewater Tank	110332	..	..	0.01	0.23	..	..	..	..	..	..	..	..	FE	ATC 12354
	Wastewater Tank	107475	..	..	0.06	1.50	..	..	..	..	..	..	..	..	FE	ATC 11909
Pits and Sumps	Well Cellars	003041	..	..	1.23	29.47	..	..	..	..	..	..	..	..	A	..
	Pits	Hole A	..	..	0.04	0.94	..	..	..	..	..	..	..	..	A	..
	Spill Catch Pan	101177	..	..	0.02	0.50	..	..	..	..	..	..	..	..	..	..
Fugitive Components	Valves, Connections, etc	002980	..	..	1.96	47.14	..	..	..	..	..	..	..	..	A	..
	Pumps/Compressors/Wellheads	003042	..	..	0.04	0.91	..	..	..	..	..	..	..	..	A	..

Notes:

- A = APCD enforceable emission limit.
- FE = Federally enforceable emission limit.

Table 5.1-4  
 BreitBurn Newlove Lease: Permit to Operate 12354  
 Quarterly and Annual Emissions

Equipment Category	Description	Dev No	NOx		CO		SOx		PM		PM <sub>10</sub>		Enforceability Basis
			TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	
Tanks	Wash Tank	002973	--	--	--	0.01	--	--	--	--	--	--	FE
	Wash Tank	002978	--	0.00	--	0.01	--	--	--	--	--	--	FE
	Wash Tank	002979	--	0.00	--	0.01	--	--	--	--	--	--	FE
	Crude Tank	002974	--	0.03	--	0.11	--	--	--	--	--	--	FE
	Wastewater Tank	110332	--	0.01	--	0.04	--	--	--	--	--	--	FE
Pits and Sumps	Wastewater Tank	107475	--	0.07	--	0.27	--	--	--	--	--	--	FE
	Well Cellars	003041	--	1.34	--	5.38	--	--	--	--	--	--	A
	Pits	Note A	--	0.04	--	0.17	--	--	--	--	--	--	A
Fugitive Components	Spill Catch Pan	101177	--	0.02	--	0.09	--	--	--	--	--	--	A
	Valves, Connections, etc	002980	--	2.15	--	8.60	--	--	--	--	--	--	A
	Pumps/Compressors/Wellheads	003042	--	0.04	--	0.17	--	--	--	--	--	--	A

Notes:

- A = APCD enforceable emission limit.
- FE = Federally enforceable emission limit.

## Santa Barbara County APCD – Equipment List

PTO 12354 / FID: 03321 Newlove Lease / SSID: 02667

### A PERMITTED EQUIPMENT

#### 1 Wastewater Tank

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<i>Device ID #</i>	<b>110332</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</i>	21.5' dia. by 16' high, connected to the vapor recovery system.		
<i>Description</i>			

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### E DE-PERMITTED EQUIPMENT

#### 1 Wastewater Tank

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<i>Device ID #</i>	<b>008206</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>Depermitted</i>		<i>Facility Transfer</i>	
<i>Device</i>	21.5' dia. by 16' high, connected to the vapor recovery system.		
<i>Description</i>			

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PERMIT EVALUATION for  
PERMIT TO OPERATE 12354

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**1.0 BACKGROUND**

- 1.1 General: As required by permit condition 8 of ATC 12354, BreitBurn submitted an application on December 19, 2007 for a Permit to Operate the replacement 1,000 bbl wastewater tank on the Newlove Lease. Emissions from this replacement tank shall be controlled by a vapor recovery system.
- 1.2 Permit History: A comprehensive permitting history of this facility may be found in section 1.2.2 of Part 70 Operating Permit and Permit to Operate 8240-R6.
- 1.3 Compliance History: See Section 3.5 of Part 70 Operating Permit and Permit to Operate 8240-R6.

**2.0 ENGINEERING ANALYSIS**

- 2.1 Equipment/Processes: The wastewater tank is used to store produced water prior to reinjection into the producing formation.
- 2.2 Emission Controls: A fugitive hydrocarbon inspection and maintenance program is used to comply with APCD Rule 331 for associated components. An 80-percent reduction is applied to valves, fittings, and wellheads for implementation of Rule 331.

The new 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.
- 2.4 Reasonable Worst Case Emission Scenario: Worst case emissions are based on operation of this facility 24 hours/day, 365 days per year at maximum permitted throughput levels.
- 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.

PERMIT EVALUATION for  
PERMIT TO OPERATE 12354

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2.9 Monitoring Requirements: Monitoring of the equipment's operational limits are required to ensure that these are enforceable. This permit requires monitoring the parameters required by APCD Rules 325.F, 331.G, 343.F.

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

**3.0 REEVALUATION REVIEW (not applicable)**

**4.0 REGULATORY REVIEW**

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

- Rule 101. Compliance of Existing Facilities
- Rule 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 343. Petroleum Storage tank Degassing
- 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 the stationary source (the I, P1, P2 and D terms of the NEI calculation) are documented in Attachment "D". There is no increase to the tank battery emissions as controlled by a vapor recovery system as a result of this wastewater tank replacement permit action, therefore there is no resultant adjustment to the Newlove Lease facility Net Emission Increase. The existing wastewater tank has operated continuously the past 3 years, therefore a "D" term was granted for the replaced tank. The "D" term is equivalent to the "I" term for the new tank. The source indicated no new piping or components are added. This was confirmed during the SCDP inspection.

**5.0 AQIA**

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

**6.0 OFFSETS/ERCs**

6.1 General: The emission offset thresholds of Regulation VIII are shown to be exceeded for NO<sub>x</sub> and ROC in the Stationary Source NEI table in Attachment D. The NEI offset threshold was exceeded as a result of permitting the construction of Phase 1 and Phase 2 of the Diatomite Thermal Enhancement Project on the Newlove Lease under ATC 12084. As a the requirement of ATC 12084, emission reduction credits are required to be surrendered prior to the onset of construction of Phase 2 to offset the NEI NO<sub>x</sub> and ROC.

PERMIT EVALUATION for  
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6.2 Offsets: Offsets are not required for this permitting action.

6.3 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 CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REVIEW:**

This project is exempt from CEQA pursuant to the Environmental Review Guidelines for the Santa Barbara County APCD (revised November 16, 2000). Appendix A.1 (*APCD Projects Exempt from CEQA*) specifically exempts replacement of an existing source with a source that will have substantially the same purpose and capacity as the source replaced. No further action is necessary.

**9.0 SCHOOL NOTIFICATION PROCESS**

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

**10.0 PUBLIC and AGENCY NOTIFICATION PROCESS/COMMENTS ON DRAFT PERMIT**

This project was/was not subject to public notice. The permittee was issued a draft permit on January 3, 2008 for comments. The permittee responded in a letter dated January 5, 2008 that there were no comments.

**11.0 FEE DETERMINATION**

Fees for the APCD's work efforts are assessed on a fee basis. The Project Code is 300000 (*Oil & Gas*). The fee calculations may be found in Attachment "C".

**12.0 RECOMMENDATION**

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

<u>Al Ronyeo</u> AQ Engineer	<u>1-9-08</u> Date	<u>Ben [Signature]</u> Engineering Supervisor	<u>1/9/08</u> Date
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ATTACHMENTS

- A Emission Calculations
- B IDS Table
- C Fee Calculations
- D Facility NEI/SSNEI

ATTACHMENT "A"

Emission Calculations

## FUGITIVE HYDROCARBON CALCULATIONS - CARB/KVB METHOD

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ADMINISTRATIVE INFORMATION
Attachment: A
Company: BreitBurn Energy Company LP
Facility: Newlove Lease
Processed by: AXR December 28, 2007
Path & File Name: \\sbcapcd.org\shares\Groups\ENGR\WP\PT70SRCE\PERM\ITS\O&G-PROD\Breitburn Orcutt\Newlove Lease\ATC 12354\Final\ATC 12354-1k bbl Wastewater Calc.xls

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

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

Data	Value	Units
Number of Active Wells at Facility		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	25	degrees API
Facility Model Number	5	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	2.8053	lb/day-well

Lease Model	Valve ROG Emission Factor Without Ethane	Fitting ROG Emission Factor Without Ethane	Composite 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	0.23	0.04
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>0.23</b>	<b>0.04</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)
<b>Total:</b>	<b>0.0000</b>	<b>ROC (lb/day)</b>

**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)

Description/Name	Number	Surface Area and Type (emissions in lbs/day)			
		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).					
			0.00	0.00	0.00

**Covered Wastewater Tanks**

Efficiency Factor: 85%

Description/Name	Number	Surface Area and Type (emissions in lbs/day)			
		Area (ft <sup>2</sup> )	Primary	Secondary	Tertiary
			0.00	0.00	0.00
			0.00	0.00	0.00

**Covered Wastewater Tanks Equipped with Vapor Recovery**

Efficiency Factor: 95%

Description/Name	Number	Surface Area and Type (emissions in lbs/day)			
		Area (ft <sup>2</sup> )	Primary	Secondary	Tertiary
Wastewater Tank 1k bbl		363.05115	0.00	0.23	0.00
			0.00	0.23	0.00

**Oil/Water Separators**

Efficiency Factor: varies (85% for cover, 95% for VRS, 0% for open top)  
Emissions Factor: 560 (lb ROC/MM Gal)

Description/Name	TP-MM Gal	Type (emissions in lbs/day)			Total lb/day
		Equipped with Cover	Equipped with VRS	Open Top	
		0.0	0.0	0.0	0.0
		0.0	0.0	0.0	0.0

ATTACHMENT "B"

IDS Table

IDS Database Emission Tables

Table 1  
Potential to Emit (PTE)

	NO <sub>x</sub>	ROC	CO	SO <sub>x</sub>	TSP	PM <sub>10</sub>
<b>PTO 12354</b>						
lb/day		0.23				
tons/year		0.04				

Table 2  
Facility Potential to Emit (FPTE)

	NO <sub>x</sub>	ROC	CO	SO <sub>x</sub>	TSP	PM <sub>10</sub>
<b>PTO 8240 – Newlove Lease</b>						
lb/day		79.89				
tons/year		14.58				

Table 3  
Federal PT-70 Facility Potential to Emit (PT70 FPTE)

	NO <sub>x</sub>	ROC	CO	SO <sub>x</sub>	TSP	PM <sub>10</sub>
<b>PTO 8240 – Newlove Lease</b>						
lb/day		31.85				
tons/year		5.82				

Table 4  
Facility Net Emission Increase Since 1990 (FNEI-90)

	NO <sub>x</sub>	ROC	CO	SO <sub>x</sub>	TSP	PM <sub>10</sub>
<b>PTO 8240 – Newlove Lease</b>						
lb/day	49.50	52.06	85.50	16.66	27.00	27.00
tons/year	9.03	7.44	15.60	3.04	4.93	4.93

**FEE STATEMENT**

PTO No. 12354

FID: 03321 Newlove Lease / SSID: 02667



Santa Barbara County  
Air Pollution Control District

**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
110332	Wastewater Tank	A6	42.000	3.26	Per 1000 gallons	No	1	1.000	136.92	0.00	0.00	136.92
Device Fee Sub-Totals =									\$136.92	\$0.00	\$0.00	\$136.92
Device Fee Total =									\$136.92			\$136.92

**Permit Fee**

Fee Based on Devices

136.92

**Fee Statement Grand Total = \$136**

**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.

ATTACHMENT "D"

Facility NEI & SSNEI

Facility Emissions Summary  
Newlove Lease FID 3321

I. This Projects "T" NEI-90

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr										
P12354				0.23	0.04								

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
P11909	5/23/2006			1.50	0.27								
A12084	6/5/2007	49.50	9.03	52.06	7.44	85.50	15.60	16.66	3.04	27.00	4.93	27.00	4.93
P12144	8/31/2007			0.00	0.00								
<b>Totals</b>		<b>49.50</b>	<b>9.03</b>	<b>53.56</b>	<b>7.71</b>	<b>85.50</b>	<b>15.60</b>	<b>16.66</b>	<b>3.04</b>	<b>27.00</b>	<b>4.93</b>	<b>27.00</b>	<b>4.93</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										
P11909	5/23/2006			1.50	0.27								
P12354				0.23	0.04								
<b>Totals</b>		<b>0.00</b>	<b>0.00</b>	<b>1.73</b>	<b>0.31</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	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
Project "T"	0.00	0.00	0.23	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P1	49.50	9.03	53.56	7.71	85.50	15.60	16.66	3.04	27.00	4.93	27.00	4.93
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	1.73	0.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>FNEI-90</b>	<b>49.50</b>	<b>9.03</b>	<b>52.06</b>	<b>7.44</b>	<b>85.50</b>	<b>15.60</b>	<b>16.66</b>	<b>3.04</b>	<b>27.00</b>	<b>4.93</b>	<b>27.00</b>	<b>4.93</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	0.00	0.00	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		49.50	9.03	52.06	7.44	85.50	15.60	16.66	3.04	27.00	4.93	27.00	4.93
3322		0.00	0.00	0.00	0.00	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	0.00	0.00	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	0.55	0.10	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>66.59</b>	<b>10.35</b>	<b>59.25</b>	<b>8.65</b>	<b>105.26</b>	<b>17.70</b>	<b>19.28</b>	<b>3.42</b>	<b>30.37</b>	<b>5.54</b>	<b>30.37</b>	<b>5.54</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 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>66.59</b>	<b>10.35</b>	<b>59.25</b>	<b>8.65</b>	<b>105.26</b>	<b>17.70</b>	<b>19.28</b>	<b>3.42</b>	<b>30.37</b>	<b>5.54</b>	<b>30.37</b>	<b>5.54</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.

**SANTA BARBARA APCD PERMITS --CEQA COMPLIANCE**

**FORM II. Permit Issuance Form**

This form must be completed by the permit engineer for ALL APCD Authority to Construct and PTO applications **prior to issuance of the final permit**. The completed form and all supporting documentation must be included in the Permit Evaluation File.

**A. General Information:**

Application Number:  P 12354

Project Name:  BreitBurn Energy Orcutt Hill Newlove Lease

Project Description (include CEQA issues, if any):

This permit allows the replacement of an existing 1,000 barrel wastewater tank on the Newlove Lease with a wastewater tank of the identical dimensions and capacity. Emissions from the replacement tank will be controlled by a vapor recovery system.

**B. Final Action:**

*Check the appropriate action that was taken by the APCO prior to issuing the permit.*

1. Ministerial Action

This permit application is exempt from CEQA because the permit evaluation is a ministerial action. CEQA does not apply to ministerial actions. No further action is necessary.

2. APCD is **Responsible Agency**: Project is Subject to Negative Declaration or EIR by Another Agency

This project was subject to approval by another agency (Lead Agency) and the project has been approved. Final action on the APCD permit was taken only after review and consideration of the information in the Lead Agency's certified final EIR or adopted final Negative Declaration by the APCO, or authorized APCD representative of the APCO.\*

This project was denied by the Lead Agency. The APCD permit application is deemed withdrawn.

\* Acting on behalf of the APCO, the permit engineer should review the ND or EIR and incorporate any mitigation measures for air quality impacts or project alternatives over which the APCD has regulatory discretion. The final permit cannot be issued until the adopted ND or certified EIR has been reviewed by the APCD for consistency.

