



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

SEP 19 2013

Mr. Joey Barulich  
Vintage Production CA, LLC  
9600 Ming Avenue, Suite 300  
Bakersfield, CA 93311

**Re: Notice of Minor Title V Permit Modification**  
**District Facility # S-8282**  
**Project # S-1122544**

Dear Mr. Barulich:

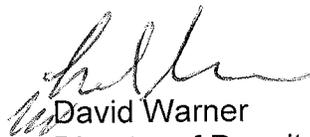
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued S-8282-9-1, '-78-0, & '-86-0 into the Title V operating permit. The ATCs authorize the installation of two new 1,000 bbl fixed roof produced water tanks with gas blanketing and vapor control and the addition of these two new tanks to the vapor control system listed on S-8282-9.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-8282-9-1, '-78-0, & '-86-0, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,



David Warner  
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

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Northern Region  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061  
[www.valleyair.org](http://www.valleyair.org)

Southern Region  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: (661) 392-5500 FAX: (661) 392-5585

# TITLE V APPLICATION REVIEW

Minor Modification  
Project #: S1122544

Engineer: Stephen Leonard  
Date: September 17, 2013

Facility Number: S-8282  
Facility Name: Vintage Production of CA, LLC  
Mailing Address: 9600 Ming Ave, Suite 300  
Bakersfield, CA 93311

*Reviewed by ASWR ADE*

SEP 18 2013

Contact Name: Joey Barulich  
Phone: 661-869-8075

Responsible Official: Armando Gonzales  
Title: Health, Environmental, Safety & Security Manager

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## I. PROPOSAL

Vintage Production California, LLC (VPC) is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct (ATC) documents S-8282-9-1, '-78-0, & '-86-0 into the Title V operating permit. The ATCs involve installing two new 1,000 bbl capacity fixed roof produced water storage tanks with natural gas head space blanketing for corrosion control (S-8282-78, '-86) and connecting the new tanks to an existing storage tank vapor recovery and control system listed on permit S-8282-9.

This Title V application was originally submitted when the subject tanks were issued ATC's and constructed as part of Occidental of Elk Hills, Inc. (OEHI) facility Light Oil Western facility S-1216. VPC is a wholly owned subsidiary of OEHI and operates crude oil production activities alongside existing OEHI operations.

On January 24, 2013, the District received applications from VPC and OEHI to transfer most of the permitted equipment and finalized ATCs from OEHI facility S-1216 to VPC facility S-8282. This action was not a transfer of ownership, but a corporate business decision to reorganize the types of business activities to be performed by the individual companies within OEHI. The District had already received the Title V minor modifications from OEHI facility S-1216 and has since reassigned them to VPC facility S-8282.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

## II. FACILITY LOCATION

The storage tanks are located on the "Little Six Lease" within the NE ¼ Section 06, Township 32 South, Range 24 East in the Buena Vista Oil Field.

## III. EQUIPMENT DESCRIPTION

**S-8282-9-3:** 2,000 BBL FIXED-ROOF WASH TANK #08002M06E WITH GAS BLANKETING, SERVED BY VAPOR CONTROL SYSTEM SHARED WITH S-8282-11, '-54, '-78, & '-86 (LITTLE SIX LEASE)

**S-8282-78-1:** 1,000 BBL FIXED-ROOF PRODUCED WATER TANK WITH GAS BLANKETING, SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-8282-9 (LITTLE SIX LEASE)

**S-8282-86-1:** 1,000 BBL FIXED-ROOF PRODUCED WATER TANK WITH GAS BLANKETING, SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-8282-9 (LITTLE SIX LEASE)

## IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

## V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

## VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Two new produced water storage tanks are installed and connected to an existing vapor control system. The equipment description for tank S-8282-9 now includes receiving vapors from new produced water tank S-8282-86. No other modifications are proposed.

## VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;

4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
  - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
  - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

## **VIII. ATTACHMENTS**

- A. Proposed Modified Title V Operating Permit Units S-8282-9-3, '-78-1, '-86-1
- B. Authorities to Construct S-8282-9-1, '-78-0, '-86-0
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit Unit S-8282-9-0

# **ATTACHMENT A**

**Proposed Modified Title V  
Operating Permit Units  
S-8282-9-3, '-78-1, '-86-1**

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-8282-9-3

EXPIRATION DATE: 08/31/2016

SECTION: NE06 TOWNSHIP: 32S RANGE: 24E

## EQUIPMENT DESCRIPTION:

2,000 BBL FIXED-ROOF WASH TANK #08002M06E WITH GAS BLANKETING, SERVED BY VAPOR CONTROL SYSTEM SHARED WITH S-8282-11, '-54, '-78, & '-86 (LITTLE SIX LEASE)

## PERMIT UNIT REQUIREMENTS

1. The tank shall be equipped with a fixed roof with no holes or openings. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The tank PV valve shall be set to within 10% of the maximum allowable working pressure of the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
3. The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The vapor control system shall be capable of reducing VOC emissions by at least 99% by weight. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. Tank shall be operated at constant fluid level. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Operation shall include make-up gas line with Varec Fig. 181 valve regulator and piping through Varec Fig. 180 valve regulator to gas gathering line. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Vapor control system compressor shall activate before the pressure relief valve on any of the units served by the vapor control system vents. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. Any tank gauging or sampling device shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. A gas leak or a liquid leak is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
11. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
12. Any component found to be leaking on two consecutive annual inspections is in violation of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
13. Varec Fig. 181 gas regulator shall activate when tank pressure falls below 2 in. H<sub>2</sub>O allowing make-up gas to enter tank. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

14. Varec Fig. 180 gas regulator shall activate when tank pressure rises above 2 in-H<sub>2</sub>O allowing vapor to be drawn into gas gathering line. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Fugitive VOC emissions from the components in gas/light liquid service and light crude oil service on tanks S-8282-9, '-11, and '-54 combined, shall not exceed 0.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Permittee shall maintain accurate component count for tank according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb (1999), Screening Value Range emissions factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
18. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rules 1070 and 4623] Federally Enforceable Through Title V Permit
19. Formerly S-1216-44.

These terms and conditions are part of the Facility-wide Permit to Operate.

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# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-8282-78-1

EXPIRATION DATE: 08/31/2016

SECTION: NE06 TOWNSHIP: 32S RANGE: 24E

## EQUIPMENT DESCRIPTION:

1,000 BBL FIXED-ROOF PRODUCED WATER TANK WITH GAS BLANKETING, SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-8282-9 (LITTLE SIX LEASE)

## PERMIT UNIT REQUIREMENTS

1. Tank shall vent exclusively to vapor control system listed on permit unit S-8282-9. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
2. All piping, valves and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
3. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
4. Any tank gauging or sampling device shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. Fugitive VOC emissions from the components in gas/light liquid service and light crude oil service on tank shall not exceed 0.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Permittee shall maintain accurate component count for tank according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb (1999), Screening Value Range emissions factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. Any component found to be leaking on two consecutive annual inspections is in violation of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
9. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rules 1070 and 4623] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-8282-86-1

EXPIRATION DATE: 08/31/2016

SECTION: NE06 TOWNSHIP: 32S RANGE: 24E

## EQUIPMENT DESCRIPTION:

1,000 BBL FIXED-ROOF PRODUCED WATER TANK WITH GAS BLANKETING, SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-8282-9 (LITTLE SIX LEASE)

## PERMIT UNIT REQUIREMENTS

1. Tank shall vent exclusively to vapor control system listed on permit unit S-8282-9. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
2. The fugitive VOC emissions from tank vapor components shall not exceed 0.3 lb-VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
3. All piping valves and fittings shall be constructed and maintained in a leak-free condition [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. A gas leak or a liquid leak is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
5. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. Any tank gauging or sampling device on a tank vented to the vapor control system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
9. Permittee shall maintain accurate component count and component types for this tank and the associated tank vapor control system and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999) Screening Value Range emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Any component found to be leaking on two consecutive annual inspections is in violation of Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

11. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
12. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070 and 4623] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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# **ATTACHMENT B**

**Authorities to Construct  
S-8282-9-1, '-78-0, '-86-0**



## AUTHORITY TO CONSTRUCT

PERMIT NO: S-8282-9-1

ISSUANCE DATE: 04/20/2011

LEGAL OWNER OR OPERATOR: VINTAGE PRODUCTION CALIFORNIA LLC  
MAILING ADDRESS: 9600 MING AVE, SUITE 300  
BAKERSFIELD, CA 93311

LOCATION: LIGHT OIL WESTERN STATIONARY SOURCE  
KERN COUNTY, CA

SECTION: NE06 TOWNSHIP: 32S RANGE: 24E

EQUIPMENT DESCRIPTION:  
MODIFICATION OF 2,000 BBL FIXED-ROOF CRUDE OIL WASH TANK #08002M06E WITH GAS BLANKETING,  
SERVED BY VAPOR CONTROL SYSTEM SHARED WITH S-8282-11, AND 78 (LITTLE SIX LEASE): CONNECT TANK  
S-8282-78 TO VAPOR CONTROL SYSTEM (REISSUE OF ATC S-1216-44-3)

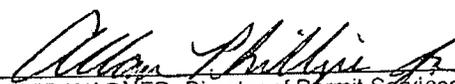
### CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Tank shall be operated at constant fluid level. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Total combined volatile organic compound (VOC) emissions from tanks S-8282-9 and S-8282-11 shall not exceed 0.24 lb per day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Permittee shall maintain accurate component count and component types for this tank and the associated tank vapor control system and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999) Screening Value Range emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The vapor control system shall be capable of reducing VOC emissions by at least 99% by weight [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Sayed Sadredin, Executive Director / APCO



DAVID WARNER, Director of Permit Services

S-8282-9-1: Apr 10 2013 9:42AM - LEONARDS : Joint Inspection NOT Required

## Conditions for S-8282-9-1 (continued)

7. The tank shall be equipped with a fixed roof with no holes or openings. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The operator shall ensure that the vapor control system is functional and is operating as designed at all times. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
9. Any tank gauging or sampling device shall be equipped with a leak free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit
10. All piping valves and fittings shall be constructed and maintained in a leak-free condition [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
11. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
12. A leak free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. A gas leak or a liquid leak is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
13. Any component found to be leaking on two consecutive annual inspections is in violation of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
14. Varec Fig. 181 gas regulator shall activate when tank pressure falls below 2 in. H<sub>2</sub>O allowing make-up gas to enter tank. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Varec Fig. 180 gas regulator shall activate when tank pressure rises above 2 in-H<sub>2</sub>O allowing vapor to be drawn into gas gathering line. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
17. This ATC shall be implemented concurrently with ATC S-8282-86-0 [District Rule 2201] Federally Enforceable Through Title V Permit
18. Formerly S-1130-12-2
19. Formerly S-1641-42.
20. Formerly S-382-775.
21. Formerly S-1216-44.



## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: 02/21/2008

PERMIT NO: S-8282-78-0

LEGAL OWNER OR OPERATOR: VINTAGE PRODUCTION CALIFORNIA LLC  
MAILING ADDRESS: 9600 MING AVE, SUITE 300  
BAKERSFIELD, CA 93311

LOCATION: LIGHT OIL WESTERN STATIONARY SOURCE  
KERN COUNTY, CA

SECTION: NE06 TOWNSHIP: 32S RANGE: 24E

**EQUIPMENT DESCRIPTION:**

1,000 BBL FIXED-ROOF PRODUCED WATER TANK WITH GAS BLANKETING, SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-8282-9 (LITTLE SIX LEASE)(REISSUE OF ATC S-1216-76-0)

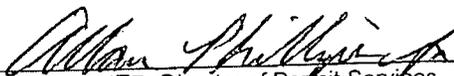
### CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Tank shall vent exclusively to gas blanketing/gathering line shared with permit unit S-8282-9. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. All piping, valves and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
6. Any tank gauging or sampling device shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

  
DAVID WARNER, Director of Permit Services  
S-8282-78-0: Apr 10 2013 9:41AM - LEONARDS : Joint Inspection NOT Required

## Conditions for S-8282-78-0 (continued)

7. Fugitive VOC emissions from the components in gas/light liquid service and light crude oil service on tank shall not exceed 0.10 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Permittee shall maintain accurate component count for tank according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb (1999), Screening Value Range emissions factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Federally Enforceable Through Title V Permit
9. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
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11. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
12. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rules 1070 and 4623] Federally Enforceable Through Title V Permit

- 3.46 Vacuum Service: operating under a negative gauge pressure or below atmospheric pressure.
  - 3.47 Valve: a device that regulates the flow of fluid in a piping system by means of an external actuator acting to permit or block passage of fluid.
  - 3.48 Visible Emissions: from well vents, visible emissions are any visible plume including water vapor. When the ambient air temperature is 60°F or less a well vent shall be considered to have visible emissions if there is any visible plume and there is a leak as defined above.
  - 3.49 Volatile Organic Compound (VOC): as defined in Rule 1020 (Definitions).
  - 3.50 VOC Collection and Control System: an APCO-approved system that is not open to the atmosphere and that is composed of hard-piping, ductwork connections and, if necessary, flow inducing devices that transport gas or vapor from a piece or pieces of equipment to an APCO-approved control device that has a VOC destruction or removal efficiency of at least 99%, or that transports gases or vapors back to a process system.
  - 3.51 VOC Emissions: emissions resulting from the operation of a steam-enhanced crude oil production well. Such emissions include uncondensed casing vent emissions and any emissions resulting from the handling, transfer, storage, or disposal of condensed and uncondensed casing vapors.
  - 3.52 Well Stimulation: cyclic steam injection of a well for up to 180 days prior to the well being placed in service as a continuous steam injection well.
  - 3.53 Well Vent: an opening on a well head that facilitates or blocks the flow of well casing vapors to the atmosphere or to a VOC collection and control system.
- 4.0 Exemptions
- 4.1 Any steam-enhanced crude oil production well undergoing service or repair during the time the well is not producing.
  - 4.2 The requirements of this rule for cyclic wells shall not apply to up to 40 wells owned by a company and undergoing pilot testing provided;
    - 4.2.1 the production zone on that property has not been injected with steam during the preceding two (2) years,
    - 4.2.2 the well is located more than 1000 feet from an existing well vent vapor collection and control system operated by the company, and
    - 4.2.3 the operation is under District permit.



**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT



## AUTHORITY TO CONSTRUCT

PERMIT NO: S-8282-86-0

ISSUANCE DATE: 04/20/2011

LEGAL OWNER OR OPERATOR: VINTAGE PRODUCTION CALIFORNIA LLC  
MAILING ADDRESS: 9600 MING AVE, SUITE 300  
BAKERSFIELD, CA 93311

LOCATION: LIGHT OIL WESTERN STATIONARY SOURCE  
KERN COUNTY, CA

SECTION: NE06 TOWNSHIP: 32S RANGE: 24E

EQUIPMENT DESCRIPTION:  
1,000 BBL FIXED ROOF PRODUCED WATER TANK WITH GAS BLANKETING AND VAPOR PIPING CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON S-8282-9 (LITTLE SIX LEASE) (REISSUE OF ATC S-1216-166-0)

### CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. The fugitive VOC emissions from tank vapor components shall not exceed 0.28 lb-VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
3. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. All piping valves and fittings shall be constructed and maintained in a leak-free condition [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. Any tank gauging or sampling device shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. This tank shall be in a gas-tight condition. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

  
DAVID WARNER, Director of Permit Services

S-8282-86-0 : Apr 10 2013 9:43AM - LEONARDS - Joint Inspection NOT Required

7. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. A gas leak or a liquid leak is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
8. Any tank gauging or sampling device on a tank vented to the vapor control system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. The operator shall ensure that the vapor control system is functional and is operating as designed at all times. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. Vapor control system compressor shall activate before the pressure relief valve on any of the units served by the vapor control system vents. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
11. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
12. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
13. Permittee shall maintain accurate component count and component types for this tank and the associated tank vapor control system and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999) Screening Value Range emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Any component found to be leaking on two consecutive annual inspections is in violation of Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
15. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2201 and 4623] Federally Enforceable Through Title V Permit
16. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070 and 4623] Federally Enforceable Through Title V Permit
17. This ATC shall be implemented concurrently with ATC S-8282-9-1. [District Rule 2201] Federally Enforceable Through Title V Permit

# **ATTACHMENT C**

## **Emissions Increases**

Vintage Production California, LLC  
S-8282; S1122544

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
S-8282-9-1	0	0	0	0	0
S-8282-78-0	0	37	0	0	0
S-8282-86-0	0	102	0	0	0
<b>TOTAL</b>	<b>0</b>	<b>139</b>	<b>0</b>	<b>0</b>	<b>0</b>

Vintage Production California, LLC  
S-8282; S1122544

# **ATTACHMENT D**

## **Application**



OCCIDENTAL OF ELK HILLS, INC.  
10800 Stockdale Highway Bakersfield, California 93311  
Telephone 661 412-5000

RECEIVED

JUL 10 2012

SJVAPCD  
Southern Region

July 10, 2012

Mr. Leonard Scandura  
Permit Services Manager  
San Joaquin Valley APCD – Southern Region  
34946 Flyover Court  
Bakersfield, CA 93308

Subject: Minor Modification to Occidental of Elk Hills, Inc.  
Title V Permit (S-1216)

Dear Mr. Scandura:

Occidental of Elk Hills, Inc. (OEHI) requests District approval for a Minor Modification of facility S-1216 Title V Permit to include the below listed Authorities to Construct. Also, ATC S-1216-77-0 should be cancelled and all references should be removed from below ATCs:

S-1216-76-0    S-1216-44-2

Please bill OEHI for all administrative costs associated with this request. If you have any questions or require addition information concerning this issue, please contact me directly at (661) 412-5263 or on my cellular phone at (661) 204-9236.

Sincerely,

Raymond Rodriguez  
Sr. Environmental Advisor  
Occidental of Elk Hills, Inc.

Cc: Mike Glavin, OEHI  
Kevin Madry, ERM

# San Joaquin Valley Air Pollution Control District

JUL 10 2012

[www.valleyair.org](http://www.valleyair.org)

SJVAPCD  
Southern Region

## Permit Application For:

ADMINISTRATIVE AMENDMENT     MINOR MODIFICATION     SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">Occidental of Elk Hills, Inc</p>		
2. MAILING ADDRESS:  STREET/P.O. BOX: <u>10800 Stockdale Hwy</u>  CITY: <u>Bakersfield</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93311</u>		
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:  STREET: <u>Elk Hills</u> CITY: <u>Tupman</u>  _____ ¼ SECTION _____ TOWNSHIP _____ RANGE _____		INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: Oil and Natural Gas Production		
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)  Incorporate the following ATCs into S-1216 Title V Permit: S-1216-76-0 and S-1216-44-2		
6. TYPE OR PRINT NAME OF APPLICANT: <p style="text-align: center;">Raymond Rodriguez</p>		TITLE OF APPLICANT: <p style="text-align: center;">Sr. Environmental Advisor</p>
7. SIGNATURE OF APPLICANT: 		DATE: July 10, 2012  PHONE: (661) 412-5263 FAX: (661) 412-5270 EMAIL: Raymond_rodriguez@oxy.com

**For APCD Use Only:**

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____  DATE PAID: _____  PROJECT NO: <u>S-1122690</u> FACILITY ID: <u>S-1216</u>
------------	------------------------------------------------------------------------------------------------------------------------------------

*Title V - Minor mod*

San Joaquin Valley  
Unified Air Pollution Control District

RECEIVED  
JUL 10 2012  
SJVAPCD  
Southern Region

**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM**

**I. TYPE OF PERMIT ACTION (Check appropriate box)**

- SIGNIFICANT PERMIT MODIFICATION                       ADMINISTRATIVE AMENDMENT  
 MINOR PERMIT MODIFICATION

COMPANY NAME: Occidental of Elk Hills, Inc	FACILITY ID: S - 1216
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Occidental of Elk Hills, Inc	
3. Agent to the Owner: Occidental of Elk Hills, Inc.	

**II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):**

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

Armando G. Gonzalez  
Signature of Responsible Official

July 10, 2012  
Date

Armando Gonzalez  
Name of Responsible Official (please print)

Health, Environmental, Safety & Security Manager  
Title of Responsible Official (please print)



OCCIDENTAL OF ELK HILLS, INC.  
10800 Stockdale Highway Bakersfield, California 93311  
Telephone 661 412-5000

RECEIVED

JUL 05 2012

SJVAPCD  
Southern Region

July 2, 2012

Mr. Leonard Scandura  
Permit Services Manager  
San Joaquin Valley APCD – Southern Region  
34946 Flyover Court  
Bakersfield, CA 93308

Subject: Minor Modification to Occidental of Elk Hills, Inc.  
Title V Permit (S-1216)

Dear Mr. Scandura:

Occidental of Elk Hills, Inc. (OEHI) requests District approval for a Minor Modification of facility S-1216 Title V Permit to include the below listed Authorities to Construct:

S-1216-166-0    S-1216-44-3

Please bill OEHI for all administrative costs associated with this request. If you have any questions or require addition information concerning this issue, please contact me directly at (661) 412-5263 or on my cellular phone at (661) 204-9236.

Yours sincerely,

Raymond Rodriguez  
Sr. Environmental Advisor  
Occidental of Elk Hills, Inc.

Cc: Mike Glavin, OEHI  
Kevin Madry, ERM

# San Joaquin Valley Air Pollution Control District

[www.valleyair.org](http://www.valleyair.org)

RECEIVED  
JUL 05 2012

SJVAPCD  
Southern Region

## Permit Application For:

ADMINISTRATIVE AMENDMENT     MINOR MODIFICATION     SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Occidental of Elk Hills, Inc	
2. MAILING ADDRESS: STREET/P.O. BOX: 10800 Stockdale Hwy CITY: Bakersfield STATE: CA 9-DIGIT ZIP CODE: 93311	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: Elk Hills CITY: Tupman ¼ SECTION TOWNSHIP RANGE	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: Oil and Natural Gas Production	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Incorporate the following ATC's into S-1216 Title V Permit: S-1216-166-0    S-1216-44-3	
6. TYPE OR PRINT NAME OF APPLICANT: Raymond Rodriguez	TITLE OF APPLICANT: Sr. Environmental Advisor
7. SIGNATURE OF APPLICANT: 	DATE: July 2, 2012 PHONE: (661) 412-5263 FAX: (661) 412-5270 EMAIL: Raymond_rodriguez@oxy.com

For APCD Use Only: NO \$

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: S-1122544 FACILITY ID: S-1216

TVMM

WES/ABP

San Joaquin Valley  
Unified Air Pollution Control District

RECEIVED  
JUL 05 2012  
SJVAPCD  
Southern Region

**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM**

**I. TYPE OF PERMIT ACTION (Check appropriate box)**

- SIGNIFICANT PERMIT MODIFICATION                       ADMINISTRATIVE AMENDMENT  
 MINOR PERMIT MODIFICATION

COMPANY NAME: Occidental of Elk Hills, Inc	FACILITY ID: S - 1216
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Occidental of Elk Hills, Inc	
3. Agent to the Owner: Occidental of Elk Hills, Inc.	

**II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial **all** circles for confirmation):**

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

Armando M. Gonzalez  
Signature of Responsible Official

July 2, 2012  
\_\_\_\_\_  
Date

Armando Gonzalez  
\_\_\_\_\_  
Name of Responsible Official (please print)

Health, Environmental, Safety & Security Manager  
\_\_\_\_\_  
Title of Responsible Official (please print)

Vintage Production California, LLC  
S-8282; S1122544

# **ATTACHMENT E**

**Previous Title V Operating Permit Unit  
S-8282-9-1**

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-8282-9-0

EXPIRATION DATE: 08/31/2016

SECTION: NE 6 TOWNSHIP: 32S RANGE: 24E

## EQUIPMENT DESCRIPTION:

2,000 BBL FIXED-ROOF WASH TANK #08002M06E WITH GAS BLANKETING, SERVED BY VAPOR CONTROL SYSTEM SHARED WITH S-8282-11, '-54, AND '-78 (LITTLE SIX LEASE)

## PERMIT UNIT REQUIREMENTS

---

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. The tank shall be equipped with a fixed roof with no holes or openings. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The tank PV valve shall be set to within 10% of the maximum allowable working pressure of the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
4. The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The vapor control system shall be capable of reducing VOC emissions by at least 99% by weight. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. Tank shall be operated at constant fluid level. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Operation shall include make-up gas line with Varec Fig. 181 valve regulator and piping through Varec Fig. 180 valve regulator to gas gathering line. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Vapor control system compressor shall activate before the pressure relief valve on any of the units served by the vapor control system vents. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. Any tank gauging or sampling device shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
11. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. A gas leak or a liquid leak is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
12. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
13. Any component found to be leaking on two consecutive annual inspections is in violation of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
14. Varec Fig. 181 gas regulator shall activate when tank pressure falls below 2 in. H<sub>2</sub>O allowing make-up gas to enter tank. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

15. Varec Fig. 180 gas regulator shall activate when tank pressure rises above 2 in-H<sub>2</sub>O allowing vapor to be drawn into gas gathering line. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Fugitive VOC emissions from the components in gas/light liquid service and light crude oil service on tanks S-8282-9, '-11, and '-54 combined, shall not exceed 0.24 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Permittee shall maintain accurate component count for tank according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb (1999), Screening Value Range emissions factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
19. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rules 1070 and 4623] Federally Enforceable Through Title V Permit
20. Formerly S-1130-12-2
21. Formerly S-1641-42.
22. Formerly S-382-775.
23. Formerly S-1216-44.

These terms and conditions are part of the Facility-wide Permit to Operate.