San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

MAR 0 9 2010

Mr. Dennis Champion
Occidental of Elk Hills, Inc.
PO Box 1001
Tupman, CA 93276-1001

Re: Proposed ATC / Certificate of Conformity (Significant Mod)
District Facility # S-2234
Project # 1094956

Dear Mr. Champion:

Enclosed for your review is the District's analysis of an application for Authorities to Construct for the facility identified above. The applicant is requesting that Certificates of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. Occidental has proposed to delete the fugitive VOC content limits, recalculate and restate the fugitive VOC emissions based on 100% VOC, and delete the requirement to test the gas for VOC content for 51 permit units.

After addressing any EPA comments made during the 45-day comment period, the Authorities to Construct will be issued to the facility with Certificates of Conformity. Prior to operating with modifications authorized by the Authorities to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

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

DW: SR/cm

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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

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MAR 0 9 2010

Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St.
San Francisco, CA 94105

Re: Proposed ATC / Certificate of Conformity (Significant Mod)
District Facility # S-2234
Project # 1094956

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authorities to Construct for Occidental of Elk Hills, Inc. near Tupman, CA, which has been issued a Title V permit. Occidental of Elk Hills, Inc. is requesting that Certificates of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. Occidental has proposed to delete the fugitive VOC content limits, recalculate and restate the fugitive VOC emissions based on 100% VOC, and delete the requirement to test the gas for VOC content for 51 permit units.

Enclosed is the engineering evaluation of this application with a copy of the current Title V permit and proposed Authorities to Construct # S-2234-122-2, 123-2, 124-2, 125-3, 126-2, 127-2, 128-2, 129-2, 130-1, 131-1, 132-1, 133-1, 134-1, 135-1, 136-1, 137-2, 139-2, 140-2, 141-2, 142-2, 143-2, 144-2, 145-2, 147-2, 150-2, 151-2, 153-2, 154-2, 157-1, 158-1, 159-1, 160-1, 161-1, 162-1, 163-1, 164-1, 165-1, 166-1, 167-1, 172-1, 175-1, 176-1, 180-1, 181-1, 196-1, 197-1, 200-1, 201-1, 202-1, 203-1 with Certificates of Conformity. After demonstrating compliance with the Authorities to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter. 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

DW: SR/cm

Enclosures

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AIR POLLUTION CONTROL DISTRICT

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MAR 0 9 2010

Mike Tollstrup, Chief
Project Assessment Branch
Air Resources Board
P O Box 2815
Sacramento, CA 95812-2815

Re: Proposed ATC / Certificate of Conformity (Significant Mod)
District Facility # S-2234
Project # 1094956

Dear Mr. Tollstrup:

Enclosed for your review is the District's analysis of an application for Authorities to Construct for the facility identified above. The applicant is requesting that Certificates of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. Occidental has proposed to delete the fugitive VOC content limits, recalculate and restate the fugitive VOC emissions based on 100% VOC, and delete the requirement to test the gas for VOC content for 51 permit units.

Enclosed is the engineering evaluation of this application with a copy of the current Title V permit and proposed Authorities to Construct # S-2234-122-2, 123-2, 124-2, 125-3, 126-2, 127-2, 128-2, 129-2, 130-1, 131-1, 132-1, 133-1, 134-1, 135-1, 136-1, 137-2, 139-2, 140-2, 141-2, 142-2, 143-2, 144-2, 145-2, 147-2, 150-2, 151-2, 153-2, 154-2, 157-1, 158-1, 159-1, 160-1, 161-1, 162-1, 163-1, 164-1, 165-1, 166-1, 167-1, 172-1, 175-1, 176-1, 180-1, 181-1, 196-1, 197-1, 200-1, 201-1, 202-1, 203-1 with Certificates of Conformity. After demonstrating compliance with the Authorities to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 30-day comment period that begins on the date you receive this letter. 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

DW: SR/cm

Enclosures

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Bakersfield Californian

NOTICE OF PRELIMINARY DECISION
FOR THE ISSUANCE OF AUTHORITY TO CONSTRUCT

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed modification of Occidental of Elk Hills, Inc. for its gas plant near Tupman, CA, California. Occidental has proposed to delete the fugitive VOC content limits, recalculate and restate the fugitive VOC emissions based on 100% VOC, and delete the requirement to test the gas for VOC content for 51 permit units.

The District's analysis of the legal and factual basis for this proposed action, project #1094956, is available for public inspection at the District office at the address below. This will be the public's only opportunity to comment on the specific conditions of the modification. If requested by the public, the District will hold a public hearing regarding issuance of this modification. For additional information, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500. Written comments on the proposed initial permit must be submitted within 45 days of the publication date of this notice to **DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CA 93726-0244.**

San Joaquin Valley Air Pollution Control District
Authority to Construct Application Review
Fugitive Emissions Recalculation

Facility Name:	Occidental of Elk Hills	Date:	2/18/10
Mailing Address:	P O Box 1001	Engineer:	Steve Roeder
	Tupman, CA 93276-1001	Lead Engineer:	Rich Karrs
Contact Person:	Dennis Champion		
Telephone:	661-763-6068		
Application #s:	S-2234-122-2, 123-2, 124-2, 125-3, 126-2, 127-2, 128-2, 129-2, 130-1, 131-1, 132-1, 133-1, 134-1, 135-1, 136-1, 137-2, 139-2, 140-2, 141-2, 142-2, 143-2, 144-2, 145-2, 147-2, 150-2, 151-2, 153-2, 154-2, 157-1, 158-1, 1591, 160-1, 161-1, 162-1, 163-1, 164-1, 165-1, 166-1, 167-1, 172-1, 175-1, 176-1, 180-1, 181-1, 196-1, 197-1, 200-1, 201-1, 202-1, 203-1		
Project #:	S-1094956		
Deemed Complete:	11/13/09		

I. Proposal

Occidental of Elk Hills, Inc. (Occidental) operates a gas processing plant containing many types of equipment, including a glycol dehydrator skid, CO_2 remover, gas dehydrators, electric powered compressor skids, and IC engine powered compressor skids. The equipment emits fugitive VOC emissions which are quantified based on the fugitive emission component count and the VOC content of the gas. Since the currently permitted VOC content of the gas is less than 100%, the gas must be periodically tested.

Occidental proposes to eliminate the requirements for annual testing and recordkeeping of the VOC content of the gas by raising the VOC content of the gas to 100% for 51 units, and recalculating and restating the fugitive emissions for each unit based on 100% VOC content.

Although not all of the modifications are proposed for equipment that has a current valid permits to operate yet, the units for which modifications have been proposed have been inspected by the District Inspector, found to exist and comply with all of the required terms and conditions, and change orders have been issued. Therefore the proposed modifications will be treated as if all the equipment were curretly permitted and new permit numbers will not be designated for any of the units in this project.

Occidental received their Title V Permit on May 31, 2001. Since this project includes the elimination of annual monitoring and testing of the gas, pursuant to Sections 3.2 and 3.20.2 of Rule 2520, this modification is neither an administrative amendment nor a minor permit modification. Therefore, pursuant to Section 3.29, this project is a significant permit modification. Pursuant to Section 6.3, the source may implement the changes addressed in the proposal for a significant permit modification only after applying for a Part 70 permit.

COC

Section 5.3.3 allows a source applying for an Authority to Construct (ATC) for a new or modified emissions unit pursuant to the provisions of District Rule 2201 (*New and Modified Stationary Source Review*) may apply simultaneously for a Part 70 permit, or a certificate of conformity (COC), in accordance with the deadlines specified in subsections 5.3.1 or 5.3.2 of this rule. Since the facility has requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the ATC. Occidental must apply to administratively amend their Title V Operating Permit to include the requirements of the ATC issued with this project.

Offsets

Since the increase in emissions From S-2234-175-1 will be greater than 0.5 lb/day, offsets will be required for this project. A portion of ERC Certificate S-2822-1 has been rserved for this purpose.

Public Notice

Since this project is a significant permit modification, Rule 2520 requires a 30 day public notice.

I. Applicable Rules

Rule 2201 New and Modified Stationary Source Review Rule (9/21/06)
Rule 2520 Federally Mandated Operating Permits (6/21/01)
Rule 4001 New Source Performance Standards (4/14/99)
Rule 4101 Visible Emissions (2/17/05)
Rule 4102 Nuisance (12/17/92)
Rule 4201 Particulate Matter (12/17/92)
Rule 4408 Glycol Dehydration Systems (December 19, 2002)
Rule 4409 Components at Light Crude Oil Production Facilities, Natural Gas Production Facilities, and Natural Gas Processing Facilities (4/20/05)
Rule 4702 Internal Combustion Engines - Phase 2 (January 18, 2007)
Rule 4801 Sulfur Compounds (12/17/92)
CH&SC 41700 Health Risk Assessment
CH&SC 42301.6 School Notice
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
CCR, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. Project Location

The equipment is located at various specified and unspecified locations in Occidental's Gas Processing stationary source (facility S-2234). The equipment will not be located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

Oxy's Gas Processing stationary source (S-2234) processes natural gas produced predominantly at Occidental of Elk Hills Light Oil Western stationary source (S-382). The affected compressors and dehydrators are used for gathering and collection the gas output throughout the Gas Processing stationary source.

V. Equipment Listing

S-2234-122-2: MODIFICATION OF GLYCOL DEHYDRATION SKID MOUNTED UNIT WITH A GLYCOL CONTACTOR, SEPARATOR COALESCER, SEVERAL GLYCOL HEAT EXCHANGERS, REBOILER/REGENERATOR EQUIPPED WITH 1.5 MMBTU/HR BURNER, GLYCOL SURGE TANK, FLASH SEPARATOR, LEAN/RICH GLYCOL EXCHANGER, VARIOUS PUMPS AND FILTERS, WITH PROCESS VENT CONNECTED TO EXISTING VACUUM GAS GATHERING SYSTEM: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-123-2: MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-14) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-124-2: MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-15) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-125-3: MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-18) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-126-2: MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-21) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: DESIGNATE AS COMPLIANT DORMANT EMISSIONS UNIT FOR RULE 4702: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-127-1: MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-25) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-128-2: MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-26) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-129-2: MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-27) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-130-1: MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-28) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE

PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-131-1: MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-29) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-132-1: MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-30) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-133-1: MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-31) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-134-1: MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-32) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-135-1: MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-33) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE

FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-136-1: MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-34) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-137-2: MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-35) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-139-2: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (R-23) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION WITH OTHER EQUIPMENT: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-140-2: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (R-24) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION WITH OTHER EQUIPMENT: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-141-2: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-95) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION WITH OTHER EQUIPMENT: RAISE PERMITTED FUGITIVE VOC CONTENT

TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-142-2: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-103) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION WITH OTHER EQUIPMENT: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-143-2: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-104) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION WITH OTHER EQUIPMENT: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-144-2: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-105) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION WITH OTHER EQUIPMENT: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-145-2: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-106) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION WITH OTHER EQUIPMENT: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-147-2: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-108] AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION

WITH OTHER EQUIPMENT: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-150-2: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-109) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION WITH OTHER EQUIPMENT: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-151-2: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-110) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION WITH OTHER EQUIPMENT: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-152-2: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-111) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION WITH OTHER EQUIPMENT: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-153-2: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-112) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION WITH OTHER EQUIPMENT: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-154-2: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-113) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE:

CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION WITH OTHER EQUIPMENT: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-157-1: ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-114) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-158-1: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-115) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-159-1: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-116) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-160-1: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-117) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-161-1: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-118) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-162-1: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-118) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-163-1: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-120) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-164-1: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-121) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-165-1: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-122) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-166-1: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-123) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-167-1: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-124) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-172-1: MODIFICATION OF GLYCOL DEHYDRATION OPERATION INCLUDING 1.5 MMBTU/HR BURNER, A GLYCOL SURGE TANK, FLASH VESSEL AND GLYCOL REBOILER VENT, A LEAN/RICH GLYCOL EXCHANGER, AND VARIOUS PUMPS AND FILTERS WITH PROCESS VENT CONNECTED TO VACUUM GAS GATHERING SYSTEM: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-175-1: MODIFICATION OF GAS DEHYDRATION SYSTEM INCLUDING; INLET GAS COALESCERS, MOLECULAR SIEVE DRYER BEDS, REGENERATION AND DRY GAS COOLERS, AND ELECTRIC MOTOR REGENERATION GAS COMPRESSOR (35R GAS PLANT): RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-176-1: MODIFICATION OF NATURAL GAS CO2 REMOVAL SYSTEM INCLUDING; MOLECULAR SIEVE CO2 REMOVAL BEDS, FIN-FAN GAS COOLERS, NITROGEN DRYING BEDS, LIQUID KNOCKOUT VESSELS AND ELECTRIC MOTOR CO2 REMOVAL COMPRESSOR(S) (35R GAS PLANT): RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-180-1: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-19) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-181-1: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-20) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-196-1: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-125) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE (S-2234): REMOVE TESTING OF GAS FOR VOC CONTENT

S-2234-197-1: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-126) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE (S-2234): REMOVE TESTING OF GAS FOR VOC CONTENT

S-2234-200-1: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (R-22) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-201-1: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-107) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-202-1: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-55) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

S-2234-203-1: MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-56) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: RAISE PERMITTED FUGITIVE VOC CONTENT TO 100%, ELIMINATE THE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE ON THE PERMIT THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND REVISE TESTING OF GAS FOR VOC CONTENT

See the Base Documents in Appendix A, and the Facility Diagram in Appendix B.

VI. Emission Control Technology Evaluation

Emissions from the compressors and dehydrators consist of VOCs from fugitive component leaks. Fugitive components associated with the these emissions units will continue to be inspected and repaired in accordance with Rule 4409 requirements, which are set forth in the Facility-Wide permit.

VII. General Calculations

A. Assumptions

- Facility will operate 24 hours/day and 365 days/yr
- Fugitive emissions result from handling gas, light liquid, and light crude oil
- Pre-project fugitive emission components will be taken from the most recent projects
- Combustion emissions from the internal combustion powered compressors will be taken from the most recent valid base documents (See Appendix A).

B. Emission Factors

- VOC emissions for the gas collection system are estimated based on *California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c, Oil and Gas Production Screening Value Ranges Emissions Factors* to determine fugitive emissions
- Pre-project emissions (except for 196-0 and 197-0) are based on a VOC/TOC content of 50%
- Post project emissions for all units are based on a VOC/TOC content of 100%
- Percentage of components with leaks is 0% (applicant)
- The fugitive component counts are listed on the individual spreadsheets, and grouped into the original project numbers for each similar emissions unit, and are presented in Appendix C
- Occidental currently has an ongoing fugitive inspection and maintenance program for equipment within the gas processing stationary source

C. Calculations

1. Pre-Project Potential to Emit (PE1), and

2. Post-Project Potential to Emit (PE2)

a. The Fugitive Daily and Annual PE1 and PE2 emissions are calculated for each of the 51 units in Appendix C, and the results are posted in the following table along with the daily and annual change in PE.

PE1 and PE2 Fugitive Emissions						
Unit	PE1 lb/day	PE1 lb/year	PE2 lb/day	PE2 lb/year	Change lb/day	Change lb/year
122-2	0.3300	120.5	0.5050	184.3	0.1750	63.9
123-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
124-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
125-3	0.4559	166.4	0.6508	237.5	0.1949	71.1
126-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
127-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
128-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
129-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
130-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
131-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
132-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
133-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
134-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
135-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
136-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
137-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
139-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
140-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
141-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
142-2	0.3495	127.6	0.6990	255.1	0.3495	127.6
143-2	0.3495	127.6	0.6990	255.1	0.3495	127.6
144-2	0.3495	127.6	0.6990	255.1	0.3495	127.6
145-2	0.3495	127.6	0.6990	255.1	0.3495	127.6
147-2	0.3495	127.6	0.6990	255.1	0.3495	127.6
150-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
151-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
152-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
153-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
154-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
157-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
158-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
159-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
160-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
161-1	0.3495	127.6	0.6990	255.1	0.3495	127.6
162-1	0.3495	127.6	0.6990	255.1	0.3495	127.6
163-1	0.3495	127.6	0.6990	255.1	0.3495	127.6
164-1	0.3495	127.6	0.6990	255.1	0.3495	127.6
165-1	0.3495	127.6	0.6990	255.1	0.3495	127.6
166-1	0.3495	127.6	0.6990	255.1	0.3495	127.6
167-1	0.3495	127.6	0.6990	255.1	0.3495	127.6
172-1	0.3891	142.0	0.5643	206.0	0.1752	63.9
175-1	0.9454	345.1	1.8909	690.2	0.9455	345.1
176-1	0.2520	92.0	0.5040	184.0	0.2520	92.0
180-1	0.5511	201.2	0.7644	279.0	0.2133	77.9
181-1	0.5511	201.2	0.7644	279.0	0.2133	77.9
196-1	0.6990	255.1	0.6990	255.1	0.0000	0.0
197-1	0.6990	255.1	0.6990	255.1	0.0000	0.0
200-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
201-1	0.3495	127.6	0.6990	255.1	0.3495	127.6
202-1	0.3495	127.6	0.6990	255.1	0.3495	127.6
203-1	0.3495	127.6	0.6990	255.1	0.3495	127.6
Totals	22.42	8,184.9	35.10	12,810.9	12.67	4,626

b. The daily and annual PE1 and PE2 combustion emissions from the internal combustion engines are calculated in Appendix D. The figures are added to the fugitive emissions (from above) and the results are posted in the following tables.

Daily PE1: Waukesha Engines Units S-2234-123-0 thru 137-0						
NOx	5.0	lb/day +	0	lb·fugitives/day =	5.0	lb·NOx/day
SO_x	0.7	lb/day +	0	lb·fugitives/day =	0.7	lb·SO_x/day
PM_{10}	1.3	lb/day +	0	lb·fugitives/day =	1.3	lb·PM_{10}/day
CO	33.9	lb/day +	0	lb·fugitives/day =	33.9	lb·CO/day
VOC	8.5	lb/day +	0.46	lb·fugitives/day =	9.0	lb·VOC/day

Daily PE2: Waukesha Engines Units S-2234-123-0 thru 137-0						
NOx	5.0	lb/day +	0	lb·fugitives/day =	5.0	lb·NOx/day
SO_x	0.7	lb/day +	0	lb·fugitives/day =	0.7	lb·SO_x/day
PM_{10}	1.3	lb/day +	0	lb·fugitives/day =	1.3	lb·PM_{10}/day
CO	33.9	lb/day +	0	lb·fugitives/day =	33.9	lb·CO/day
VOC	8.5	lb/day +	0.65	lb·fugitives/day =	9.2	lb·VOC/day

Annual PE1: Waukesha Engines Units S-2234-123-0 thru 137-0						
NOx	1,808	lb/year +	0	lb·fugitives/year =	1,808	lb·NOx/year
SO_x	262	lb/year +	0	lb·fugitives/year =	262	lb·SO_x/year
PM_{10}	476	lb/year +	0	lb·fugitives/year =	476	lb·PM_{10}/year
CO	12,372	lb/year +	0	lb·fugitives/year =	12,372	lb·CO/year
VOC	3,093	lb/year +	166.4	lb·fugitives/year =	3,259	lb·VOC/year

Annual PE2: Waukesha Engines Units S-2234-123-0 thru 137-0						
NOx	1,808	lb/year +	0	lb·fugitives/year =	1,808	lb·NOx/year
SO_x	262	lb/year +	0	lb·fugitives/year =	262	lb·SO_x/year
PM_{10}	476	lb/year +	0	lb·fugitives/year =	476	lb·PM_{10}/year
CO	12,372	lb/year +	0	lb·fugitives/year =	12,372	lb·CO/year
VOC	3,093	lb/year +	238	lb·fugitives/year =	3,331	lb·VOC/year

c. The annual PE1 for all units is presented in the following table.

PE1: Project 1094956 (Annual Emissions lb/year)					
	NO_x	SO_x	PM_{10}	CO	VOC
S-2234-122-1	0	0	0	0	121
S-2234-123-1	1,808	262	476	12,372	3,259
S-2234-124-1	1,808	262	476	12,372	3,259
S-2234-125-1	1,808	262	476	12,372	3,259
S-2234-126-0	1,808	262	476	12,372	3,259
S-2234-127-0	1,808	262	476	12,372	3,259
S-2234-128-0	1,808	262	476	12,372	3,259
S-2234-129-1	1,808	262	476	12,372	3,259
S-2234-130-0	1,808	262	476	12,372	3,259
S-2234-131-0	1,808	262	476	12,372	3,259
S-2234-132-0	1,808	262	476	12,372	3,259
S-2234-133-0	1,808	262	476	12,372	3,259
S-2234-134-0	1,808	262	476	12,372	3,259
S-2234-135-0	1,808	262	476	12,372	3,259
S-2234-136-0	1,808	262	476	12,372	3,259

S-2234-137-0	1,808	262	476	12,372	3,259
S-2234-139-1	0	0	0	0	166
S-2234-140-1	0	0	0	0	166
S-2234-141-1	0	0	0	0	166
S-2234-142-1	0	0	0	0	128
S-2234-143-1	0	0	0	0	128
S-2234-144-1	0	0	0	0	128
S-2234-145-1	0	0	0	0	128
S-2234-147-1	0	0	0	0	128
S-2234-150-1	0	0	0	0	166
S-2234-151-1	0	0	0	0	166
S-2234-152-1	0	0	0	0	166
S-2234-153-1	0	0	0	0	166
S-2234-154-1	0	0	0	0	166
S-2234-157-0	0	0	0	0	166
S-2234-158-0	0	0	0	0	166
S-2234-159-0	0	0	0	0	166
S-2234-160-0	0	0	0	0	166
S-2234-161-0	0	0	0	0	128
S-2234-162-0	0	0	0	0	128
S-2234-163-0	0	0	0	0	128
S-2234-164-0	0	0	0	0	128
S-2234-165-0	0	0	0	0	128
S-2234-166-0	0	0	0	0	128
S-2234-167-0	0	0	0	0	128
S-2234-172-0	0	0	0	0	142
S-2234-175-0	0	0	0	0	345
S-2234-176-0	0	0	0	0	92
S-2234-180-0	0	0	0	0	201
S-2234-181-0	0	0	0	0	201
S-2234-196-0	0	0	0	0	255
S-2234-197-0	0	0	0	0	255
S-2234-200-0	0	0	0	0	166
S-2234-201-0	0	0	0	0	128
S-2234-202-0	0	0	0	0	128
S-2234-203-0	0	0	0	0	128
Total	27,120	3930	7140	185,580	54,574

d. The annual PE2 is presented for all units in the following table.

PE2: Project 1094956 (Annual Emissions lb/year)					
	NO_x	SO_x	PM_{10}	CO	VOC
S-2234-122-2	0	0	0	0	184
S-2234-123-2	1,808	262	476	12,372	3,331
S-2234-124-2	1,808	262	476	12,372	3,331
S-2234-125-3	1,808	262	476	12,372	3,331
S-2234-126-2	1,808	262	476	12,372	3,331

S-2234-127-1	1,808	262	476	12,372	3,331
S-2234-128-2	1,808	262	476	12,372	3,331
S-2234-129-2	1,808	262	476	12,372	3,331
S-2234-130-1	1,808	262	476	12,372	3,331
S-2234-131-1	1,808	262	476	12,372	3,331
S-2234-132-1	1,808	262	476	12,372	3,331
S-2234-133-1	1,808	262	476	12,372	3,331
S-2234-134-1	1,808	262	476	12,372	3,331
S-2234-135-1	1,808	262	476	12,372	3,331
S-2234-136-1	1,808	262	476	12,372	3,331
S-2234-137-2	1,808	262	476	12,372	3,331
S-2234-139-2	0	0	0	0	237.5
S-2234-140-2	0	0	0	0	237.5
S-2234-141-2	0	0	0	0	237.5
S-2234-142-2	0	0	0	0	255
S-2234-143-2	0	0	0	0	255
S-2234-144-2	0	0	0	0	255
S-2234-145-2	0	0	0	0	255
S-2234-147-2	0	0	0	0	255
S-2234-150-2	0	0	0	0	237.5
S-2234-151-2	0	0	0	0	237.5
S-2234-152-2	0	0	0	0	237.5
S-2234-153-2	0	0	0	0	237.5
S-2234-154-2	0	0	0	0	237.5
S-2234-157-1	0	0	0	0	237.5
S-2234-158-1	0	0	0	0	237.5
S-2234-159-1	0	0	0	0	237.5
S-2234-160-1	0	0	0	0	237.5
S-2234-161-1	0	0	0	0	255
S-2234-162-1	0	0	0	0	255
S-2234-163-1	0	0	0	0	255
S-2234-164-1	0	0	0	0	255
S-2234-165-1	0	0	0	0	255
S-2234-166-1	0	0	0	0	255
S-2234-167-1	0	0	0	0	255
S-2234-172-1	0	0	0	0	206
S-2234-175-1	0	0	0	0	690
S-2234-176-1	0	0	0	0	184
S-2234-180-1	0	0	0	0	279
S-2234-181-1	0	0	0	0	279
S-2234-196-1	0	0	0	0	255
S-2234-197-1	0	0	0	0	255
S-2234-200-1	0	0	0	0	237.5
S-2234-201-1	0	0	0	0	255
S-2234-202-1	0	0	0	0	255
S-2234-203-1	0	0	0	0	255
Total	27,120	3,930	7,140	185,580	59,210

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to Section 4.9 of District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERCs) which have been banked since September 19, 1991 for Actual Emissions Reductions (AER) that have occurred at the source, and which have not been used on-site.

The SSPE1 is used to determine if:

a. If the facility is becoming a new major source,
b. An offset threshold will be surpassed with this project, or if
c. A Stationary Source Increase in Permitted Emissions (SSIPE) public notice is triggered.

Pursuant to Project 1085308, this facility is already a major source for VOC emissions. Since there are no changes in emissions for any other pollutant associated with this project, the SSPE1 is unnecessary.

4. Post Project Stationary Source Potential to Emit (SSPE2)

Pursuant to Section 4.10 of District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) is the PE from all units with valid ATCs or PTOs at the Stationary Source and the quantity of ERCs which have been banked since September 19, 1991 for AER that have occurred at the source, and which have not been used on-site.

The SSPE2 is used to determine if:

a. The facility is becoming a new Major Source,
b. An offset threshold will be surpassed, or if
c. An SSIPE public notice is triggered

Pursuant to Project 1085308, this facility is already a major source for VOC emissions. Since there are no changes in emissions for any other pollutant associated with this project, the SSPE2 is unnecessary.

5. Major Source Determination

Pursuant to Section 3.24 of District Rule 2201, a major source is a stationary source with post-project emissions or a SSPE2, equal to or exceeding one or more of the major source threshold values. However, Section 3.24.2 states, "for the purposes of determining major source status, the SSPE2 shall not include the quantity of ERCs which have been banked since September 19, 1991 for AER that have occurred at the source, and which have not been used on-site."

This source is an existing major source for VOC emissions and will remain a major source for VOC. No change in other pollutants are proposed or expected as a result of this project.

6. Baseline Emissions (BE)

The BE calculation (lb/year) is performed pollutant-by-pollutant for each unit within the project, to calculate the QNEC and if applicable, to determine the amount of offsets required.

Pursuant to Section 3.7 of District Rule 2201, BE = PE1 for:

- Any unit located at a non-major source,
- Any highly-utilized emissions unit, located at a major source,
- Any fully-offset emissions unit, located at a major source, or
- Any clean emissions unit, located at a major source.

Facility S-2234 is a major source for VOC emissions.

Pursuant to Section 3.12.2, a clean emissions unit is a unit is equipped with emission control technology that meets the requirements for achieved-in-practice BACT as accepted by the APCO during the five years immediately prior to the submission of the complete application.

Since the gas gathering and collection system is a clean emissions unit, the BE is the same as the PE1 for each unit in this project as listed above.

7. Major Modification

Major Modification is defined in 40 CFR Part 51.165 as "*any physical change in or change* in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

Regarding VOC emissions, pursuant to 40 CFR 51.165 (a)(1)(iv)(A)(1)(iii), a major source is any stationary source of air pollutants in any severe ozone nonattainment area that emits, or has the potential to emit, 25 tons per year of volatile organic compounds.

Pursuant to Section 40 CFR 51.165(a)(1)(iv)(C)(1-27), the fugitive emissions from a stationary source shall *not* be included in determining for any of the purposes of this paragraph whether it is a major stationary source (or major modification), unless the source belongs to a list of facilities that does not include oilfields.

Since the only increase in emissions associated with this project are fugitive VOC emissions only, this project cannot constitute a major modification.

8. Federal Major Modification

As shown above, this project does not constitute a major modification. Therefore, in accordance with District Rule 2201, Section 3.17, this project does not constitute a federal major modification.

9. Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screens for the District's PAS database, which are presented in Appendix F. The QNEC shall be calculated as follows:

QNEC = (PE2 - PE1) ÷ 4 quarters per year, where:

QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.
PE2 = Post Project Potential to Emit for each emissions unit, lb/yr.
PE1 = Pre-Project Potential to Emit for each emissions unit, lb/yr.

Using the values determined above, the QNEC is calculated for each permit unit and for each pollutant in the following table by dividing the annual increases in emissions (from Section VII.C above) into 4 equal quarters per year as shown in the following table.

QNEC S-3585				
Unit	Pollutant	PE2 (lb/yr)	PE1 (lb/yr)	QNEC (lb/qtr)
S-2234-122-2	VOC	184	121	16
S-2234-123-2	VOC	3,331	3,259	18
S-2234-124-2	VOC	3,331	3,259	18
S-2234-125-3	VOC	3,331	3,259	18
S-2234-126-2	VOC	3,331	3,259	18
S-2234-127-1	VOC	3,331	3,259	18
S-2234-128-2	VOC	3,331	3,259	18
S-2234-129-2	VOC	3,331	3,259	18
S-2234-130-1	VOC	3,331	3,259	18
S-2234-131-1	VOC	3,331	3,259	18
S-2234-132-1	VOC	3,331	3,259	18
S-2234-133-1	VOC	3,331	3,259	18
S-2234-134-1	VOC	3,331	3,259	18
S-2234-135-1	VOC	3,331	3,259	18
S-2234-136-1	VOC	3,331	3,259	18
S-2234-137-2	VOC	3,331	3,259	18
S-2234-139-2	VOC	237.5	166	18
S-2234-140-2	VOC	237.5	166	18
S-2234-141-2	VOC	237.5	166	18
S-2234-142-2	VOC	255	128	32
S-2234-143-2	VOC	255	128	32
S-2234-144-2	VOC	255	128	32
S-2234-145-2	VOC	255	128	32
S-2234-147-2	VOC	255	128	32

S-2234-150-2	VOC	237.5	166	18
S-2234-151-2	VOC	237.5	166	18
S-2234-152-2	VOC	237.5	166	18
S-2234-153-2	VOC	237.5	166	18
S-2234-154-2	VOC	237.5	166	18
S-2234-157-1	VOC	237.5	166	18
S-2234-158-1	VOC	237.5	166	18
S-2234-159-1	VOC	237.5	166	18
S-2234-160-1	VOC	237.5	166	18
S-2234-161-1	VOC	255	128	32
S-2234-162-1	VOC	255	128	32
S-2234-163-1	VOC	255	128	32
S-2234-164-1	VOC	255	128	32
S-2234-165-1	VOC	255	128	32
S-2234-166-1	VOC	255	128	32
S-2234-167-1	VOC	255	128	32
S-2234-172-1	VOC	206	142	16
S-2234-175-1	VOC	690	345	86
S-2234-176-1	VOC	184	92	23
S-2234-180-1	VOC	279	201	20
S-2234-181-1	VOC	279	201	20
S-2234-196-1	VOC	255	255	0
S-2234-197-1	VOC	255	255	0
S-2234-200-1	VOC	237.5	166	18
S-2234-201-1	VOC	255	128	32
S-2234-202-1	VOC	255	128	32
S-2234-203-1	VOC	255	128	32

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis for the following*:

a. Any new emissions unit with a potential to emit exceeding two pounds per day,
b. The relocation from one stationary source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
d. Any new or modified emissions unit, in a stationary source project, which results in a major modification.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

a. New emissions units – PE > 2 lb/day

The applicant has not proposed to install any new emissions units. Therefore BACT is not triggered for new emission unit purposes.

b. Relocation of emissions units – PE > 2 lb/day

There are no emissions units being relocated from one stationary source to another. Therefore BACT is not triggered for relocation purposes.

c. Modification of emissions units – AIPE > 2 lb/day

The modification to the gas collection system leads to increases in daily VOC emissions for all units in this project. However, since none of the increases are above 2 lb/day, BACT is not triggered for modification purposes.

d. Major Modification

As discussed in Section VII.C.7 above, this project is not a major modification. Therefore, BACT is not triggered for major modification purposes.

2. BACT Guideline

Since BACT is not triggered for this project, no BACT guideline is required.

B. Offsets

1. Offset Applicability

Pursuant to Section 4.5.3 of Rule 2201, offset requirements shall be triggered on a pollutant by pollutant basis if the SSPE2 equals to or exceeds the offset threshold levels shown in Table 4-1 of Rule 2201.

Since this is already a major source for VOC emissions, and the facility emissions are above the offset threshold for VOC, offsets are triggered for VOC emissions.

2. Quantity of Offsets Required

Pursuant to Section 4.7.1 of Rule 2201, for pollutants with an SSPE1 greater than the emission offset threshold levels, emission offsets shall be provided for all Increases in Stationary Source emissions (SSIPE), calculated as the sum of differences between the post-project PE2 and the BE of all new and modified emissions units (plus all increases in cargo carriers, of which there are none for this project).

Since the SSPE1 is already above the offset threshold for VOC, offsets will be required for all increases in VOC emissions.

However, according to District Policy APR 1130, *Increases in Maximum Permitted Daily Emissions of Less Than or Equal to 0.5 lb/day*, a daily increase in permitted

emissions of any criteria pollutant of less than or equal to 0.5 lb/day *per permit unit* is rounded to zero (0) lb/day, only for the purposes of determining whether New and Modified Source Review (NSR) rule requirements, such as offsets, are triggered.

Based on the increases in fugitive VOC emissions posted above, the increases in emissions for all of the units, except for S-2234-175-1 are less than 0.5 lb/day and therefore round to zero lb/day for offset purposes.

The increase in emissions for unit 175-1 is 0.9455 lb/day. Multiplied by 365 days per year, the total increase is 345.1 lb, for which offsets will be required. Divided into 4 quarters per year, the facility must therefore provide 86 lb-VOC/quarter for the first 3 quarters and 87 lb-VOC for the 4th quarter of the year, at the appropriate offset ratio established in Rule 2201 Section 4.8.

Since the ERC Certificate offered by the facility to provide these offsets (S-2822-1) had originated at this facility, the offset ratio will be 1:1.

Therefore, reservations of 86, 86, 86 and 87 lb/quarter has been placed on ERC Certificate S-2822-1 to provide the required offsets for this project, and the following conditions will be listed on the permit for 175-1 to ensure compliance.

- Prior to operating equipment under this Authority to Construct, the permittee shall surrender VOC emission reduction credits in the following quantities: 1st quarter - 86 lb, 2nd quarter - 86 lb, 3rd quarter - 86 lb, and 4th quarter - 87 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201]
- ERC Certificate Number S-2822-1 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, at which time this Authority to Construct shall be administratively reissued, specifying the new offsetting proposal. [District Rule 2201]

C. Public Notification

1. Applicability

Public noticing is required for:
a. Any new Major Source, which is a new facility that is also a Major Source,
b. Major Modifications,
c. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
d. Any project which results in the offset thresholds being surpassed, and/or
e. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant.

a. New Major Source

Section 5.4.1 of Rule 2201 requires public noticing for new major sources. New major sources are new facilities, which are also major sources. Since this is an

existing major source, it is not a new major source. Therefore public noticing is not required for this project for new major source purposes.

b. Major Modification

Section 5.4.1 of Rule 2201 requires public noticing for projects including major modifications. As demonstrated in VII.C.7 above, this project is not a major modification. Therefore, public noticing for major modification purposes is not required.

c. PE > 100 lb/day

Section 5.4.2 of Rule 2201 requires public noticing for projects that include a new emissions unit with a PE greater than 100 pounds per day. As shown in Section VII.C.2 above, this project does not include any new emissions units that have daily emissions greater than 100 lb/day for any pollutant. Therefore public noticing for PE > 100 lb/day purposes is not required.

d. Offset Threshold

Section 5.4.3 of Rule 2201 requires public noticing for modifications that increase the SSPE1 from a level below the emissions offset threshold level to a level exceeding the emissions offset threshold level for any pollutant.

Since the facility's annual VOC emissions are already above the offset threshold, public noticing will not be required for surpassing the offset threshold.

e. SSIPE > 20,000 lb/year

Section 5.4.5 of Rule 2201 requires public notification for any project that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. As tabulated at the end of Appendix C, the total increase in VOC emissions (without rounding) is 4,626 lbs. Since this is less than the 20,000 SSIPE threshold, public noticing will not be required for SSIPE > 20,000 lb/year purposes.

2. Public Notice Action

As discussed above, this project will not result in emissions, for any pollutant, which would subject the project to any of the noticing requirements. Therefore, public noticing will not be required for this project under Rule 2201. However, public noticing will be required under Rule 2520 (see discussion below).

D. Daily Emission Limits (DELs)

Pursuant to Rule 2201 Section 3.15, DELs and other enforceable conditions are required to restrict a unit's maximum daily emissions to a level at or below the emissions associated with the maximum design capacity. The DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

Therefore, following permit conditions will be listed on the appropriate permits to ensure compliance.

S-2234-122-1 - Glycol Dehydrator Skid

- Fugitive emissions, calculated using CAPCOA *California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c* (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.5 lb VOC/day. [District Rule 2201]

In addition, the following conditions shall be listed on the permit under Rules 2020 and 2201.

- Glycol reboiler heater shall be fired on natural gas containing no more than 0.75 gr S/100 scf and no more than 5% by weight hydrocarbons heavier that butane. [District Rule 2020]
- Only glycol shall be used as the dehydration medium. [District Rule 2201]
- Condensate handling shall be conducted in closed systems resulting in fugitive component emissions only. [District Rule 2201]

S-2234-123-1, 124-1, 125-1, 126-1, 127-1, 128-1, 129-1, 130-1, 131-1, 132-1, 133-1, 134-1, 135-1, 136-1, 137-1: - Waukesha Compressor Engines

- IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201]
- Emissions from this IC engine shall not exceed any of the following limits: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District Rules 2201 and 4702, 5.1]
- Fugitive emissions, calculated using CAPCOA *California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c* (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.65 lb VOC/day. [District Rule 2201]
- The fuel consumption limit for this engine shall not exceed 241,600 scf/day. [District Rule 2201]
- The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District Rule 2201]
- If the IC engine is fired on PUC-regulated natural gas, the permittee shall maintain on file, copies of all natural gas bills. [District Rule 2201]
- If the engine is fired on non-PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201]
- If the engine is fired on non-PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content

requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201]

- IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201]
- The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201]
- Emissions from this IC engine shall not exceed any of the following limits: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District Rule 2201 and 4702, 5.1]

S-2234-139-2, 140-2, 141-2, 150-2, 151-2, 152-2 ,153-2, 154-2, 157-1, 158-1, 159-1, 160-1, 200-1: Electric Compressors

- Fugitive emissions, calculated using CAPCOA *California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c* (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.65 lb VOC/day. [District Rule 2201]

S-2234-142-2, 143-2, 144-2, 145-2, 147-2, 161-1, 162-1, 163-1, 164-1, 165-1, 166-1, 167-1, 196-1, 197-1, 201-1, 202-1, 203-1: Electric Compressors

- Fugitive emissions, calculated using CAPCOA *California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c* (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201]

S-2252-172-1: Glycol Dehydrator

- Fugitive emissions, calculated using CAPCOA *California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c* (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.56 lb VOC/day. [District Rule 2201]

In addition, the following conditions will be listed on the permit from Rules 2020 and 2201.

- Glycol reboiler heater shall be fired on natural gas containing no more than 0.75 gr S/100 scf and no more than 5% by weight hydrocarbons heavier that butane. [District Rule 2020]
- Only glycol shall be used as the dehydration medium. [District Rule 2201]
- Condensate handling shall be conducted in closed systems resulting in fugitive component emissions only. [District Rule 2201]

S-2522-175-1: Gas Dehydrator

- Fugitive emissions, calculated using CAPCOA *California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c* (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 1.9 lb VOC/day. [District Rule 2201]

S-2234-176-1: CO_2 Remover

- Fugitive emissions, calculated using CAPCOA *California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c* (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.5 lb VOC/day. [District Rule 2201]

S-2234-180-1, 181-1: Electric Compressor

- Fugitive emissions, calculated using CAPCOA *California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c* (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.76 lb VOC/day. [District Rule 2201]

E. Compliance Assurance

1. Source Testing

Emissions source testing for the Waukesha internal combustion compressor skid engines will remain as listed on the current base documents and will be discussed in more detail under Rule 4702 below.

2. Monitoring

Monitoring of the VOC/TOC content of the gas in the gas collection system will no longer be required, since it will be assumed to be 100%.

Monitoring of the fuel sulfur content of the Waukesha internal combustion compressor engines will still be required. Therefore, the following conditions will be listed on the engine permits to ensure compliance.

- If the engine is fired on non-PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201] N
- If the engine is fired on non-PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201] N

3. Recordkeeping

Recordkeeping is required to demonstrate compliance with the daily emission limit, offset, and public notification requirements of Rule 2201. The recordkeeping condition regarding the fugitive VOC emissions will be satisfied by the DEL conditions stated above.

The applicant has not requested that the requirement to maintain a written record of the VOC content of the processed gas be removed from the permits. However, the VOC content of the gas will be assumed to be 100%, and the sampling and testing requirements will be removed from the permit. Therefore, there will be no reason to require that a written record of the VOC content of the gas be maintained (except as part of the calculation in the DEL conditions presented above), and any conditions to keep such records shall be removed from the permits.

The following recordkeeping requirements shall be retained on all of the permits for equipment permitted to operate at various unspecified locations..

- Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]

The majority of the recordkeeping requirements arise from the prohibitory rules discussed below.

4. Reporting

The only Rule 2201 reporting required is addressed in the following condition for each compressor skid.

- Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]

Rule 2520 Federally Mandated Operating Permits

As discussed in Section I, Occidental received their Title V Permit on May 31, 2001. Since this project includes the elimination of annual monitoring and testing of the collected gas, pursuant to Sections 3.2 and 3.20.2, this modification is neither an administrative amendment nor a minor permit modification. Therefore, pursuant to Section 3.29, this project constitutes a significant permit modification. Pursuant to Section 6.3, the source may implement the changes addressed in the proposal for a significant permit modification *only after* applying for a Part 70 permit amendment to the District.

Section 5.3.3 allows a source applying for a significant modification to simultaneously apply for a Part 70 permit, or request a COC in accordance with the deadlines specified in subsections 5.3.1 or 5.3.2 of this rule. Since the facility has requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. Occidental must apply to administratively amend their Title V Operating Permit to include the requirements of the ATC issued with this project.

Pursuant to Section 11.3.1, a 30-day public notification period will be required for all proposed significant permit modifications. The written notice shall be given by publication in a newspaper of general circulation in the District. In addition, the written notice along with a copy of the District analysis shall be submitted to the California Air Resources Board (ARB), and shall be made available to all interested parties.

Pursuant to Section 11.3.1.2, the notice shall provide the following information:

11.3.1.2.1 The identification of the source, the name and address of the permit holder, the activities and emissions change involved in the permit action;

11.3.1.2.2 The name and address of the District, the name and telephone number of District staff to contact for additional information;

11.3.1.2.3 The availability, upon request, of a statement that sets forth the legal and factual basis for the proposed permit conditions;

11.3.1.2.4 The location where the public may inspect the complete application, the District analysis, the proposed permit, and all relevant supporting materials;

11.3.1.2.5 A statement that the public may submit written comments regarding the proposed decision within at least 30 days from the date of publication and a brief description of commenting procedures, and

11.3.1.2.6 A statement that members of the public may request the APCO or his designee to preside over a public hearing for the purpose of receiving oral public comment, if a hearing has not already been scheduled. The APCO shall provide notice of any public hearing scheduled to address the proposed decision at least 30 days prior to such hearing.

Rule 4001 New Source Performance Standards (NSPS)

The purpose of this rule is to incorporate the New Source Performance Standards from Part 60, Chapter 1, Title 40, Code of Federal Regulations (CFR). The only equipment in this project to which Rule 4001 applies are the Gas Dehydration System and CO_2 Removal System.

Therefore, all of the conditions listed on permit S-2234-175-0 and 176-0 from 40 CFR 60 shall be retained on S-2234-175-1 and 176-1.

Rule 4101 Visible Emissions

Per Section 5.0, no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity). Each unit in this project is subject to this rule.

None of the units in this project are expected to have visible emissions greater than 20% opacity or Ringelmann 1. Ongoing compliance with Rule 4101 is anticipated, and the following condition will remain on the facility-wide permit S-2234-0 to ensure compliance.

- No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]

Rule 4102 Nuisance

Rule 4102 states that no air contaminant shall be released into the atmosphere which causes a public nuisance.

This project is located in a remote oilfield setting in Kern County. Nuisance complaints are not expected, and the following condition will remain on the facility-wide permit S-2234-0 to ensure compliance.

- No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 - Risk Management Policy for Permitting New and Modified Sources (3/2/01) specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

Therefore a risk management review has been performed for this project to analyze the impact of toxic emissions. For projects where the increase in cancer risk is greater than one per million, Toxic Best Available Control Technology (T-BACT) is required.

The RMR Summary is presented in Appendix E and the results are posted in the following table.

RMR Summary			
Categories	**Increased VOC Fugitive Emissions (Units 122-2 thru 203-1)**	**Project Totals**	**Facility Totals**
Prioritization Score	**0.00***	0.00	>1
Acute Hazard Index	N/A	N/A	0.12
Chronic Hazard Index	N/A	N/A	0.04
Maximum Individual Cancer Risk	N/A	N/A	2.46E-06
T-BACT Required?	No		
Special Permit Conditions?	No		

*The prioritization score was determined to be insignificant (less than 0.05); therefore, the effective prioritization score for this project is considered to be 0.00.

Discussion of Toxic Best Available Control Technology (T-BACT)

BACT for toxic emission control (T-BACT) is required if the cancer risk exceeds one in one million. As shown in the table above, The prioritization score for this project is not above 1.0. In accordance with the District's Risk Management Policy, the project is approved without Toxic Best Available Control Technology (T-BACT).

Compliance with the District's Risk Management Policy is expected.

Rule 4201 Particulate Matter Concentration

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot. Since this project only involves the change in VOC/TOC content of collected gas, particulate matter emissions are not expected, and no Rule 4201 conditions will be added to any of the permits. The existing Rule 4201 conditions on the Waukesha engine compressor skid permits will remain in place.

Rule 4408 Glycol Dehydration Systems

The purpose of this rule is to limit VOC emissions from glycol dehydration systems. This rule also specifies the administrative and recordkeeping requirements, and the test methods. It applies to any glycol dehydration system with a glycol dehydration vent that is subject to permitting requirements pursuant to Regulation II (Permits), including units S-2234-122-2 and 172-1.

The following conditions will be retained on permit 122-2 and listed on 172-1 to ensure continued compliance.

- The glycol dehydration system shall not be operated unless all vapors are directed to the vapor recovery system, a fuel gas system or a sales gas system, or a system in which VOC emissions are combusted by a flare, incinerator, reboiler, or thermal oxidizer. [District Rule 4408, 5.1] Y
- The condensed hydrocarbon liquid stream from the glycol dehydration vent shall be stored and handled in a manner that will not cause or allow evaporation of VOC to the atmosphere. [District Rule 4408, 5.2] Y
- A leak is defined as the dripping at a rate of more than three (3) drops per minute of liquid containing VOCs or a reading as methane in excess of 10,000 ppm above background when measured at a distance of one (1) centimeter from the potential source in accordance with EPA Method 21. [District Rule 4408, 3.8.1] Y
- All control systems shall be maintained in a leak-free condition as determined by EPA Method 21. [District Rule 4408, 5.3] Y
- VOC control efficiency shall be no less than 95% by weight. [District Rule 4408, 5.1] Y
- The operator of any glycol dehydration system subject to this rule shall maintain monthly records of the amount of gas dehydrated (MMSCF). [District Rule 4408, 6.1.1] Y
- The operator of any glycol dehydration system shall maintain the following records: facility name and APCD permit number; description of any installed VOC control system; flow diagram of dehydrator and any VOC controls; and maintenance records of the VOC control system. [District Rule 4408, 6.1.2] Y

- The records listed in Sections 6.1.1, 6.1.2, and 6.1.3 shall be retained on the premises for a period of not less than five years and made available to any District representative upon request. [District Rule 4408, 6.1] Y

Rule 4409 Components at Light Crude Oil Production Facilities, Natural Gas Production Facilities, and Natural Gas Processing Facilities

The purpose of this rule is to limit VOC emissions from leaking components at light crude oil production facilities, natural gas production facilities, and natural gas processing facilities. Rule 4409 applies to components containing or contacting VOC streams at light crude oil production facilities, natural gas production facilities, and natural gas processing facilities.

This Rule applies to every permit unit in this project. The following 55 relevant Rule 4409 conditions are already listed on the facility-wide (S-2234-0-2) permit for this facility to ensure compliance.

- {3321} The permittee shall not use any components that leak in excess of the applicable leak standards as specified in this permit. Components that have been found leaking in excess of the applicable leak standards of this rule may be used provided such leaking components have been identified with a tag for repair, are repaired, or are awaiting re-inspection after being repaired, within the applicable time period specified in this permit. [District Rule 4409, 5.1.1] Y
- {3322} For valves, threaded connections, flanges, pipes, pumps, compressors, and other components not specified in this permit; a major gas leak is a detection of > 10,000 ppmv as methane; a minor gas leak is a detection of 1,000 to 10,000 ppmv as methane when the component is in liquid service; a minor gas leak is a detection of 2,000 to 10,000 ppmv as methane when the component is in gas/vapor service. [District Rule 4409, 5.1.1] Y
- {3323} For pressure relief devices (PRDs); a major gas leak is a detection of > 10,000 ppmv as methane; a minor gas leak is a detection of 200 to 10,000 ppmv as methane when the component is in liquid service; a minor gas leak is a detection of 400 to 10,000 ppmv as methane when the component is in gas/vapor service. [District Rule 4409, 5.1.1] Y
- {3324} For polished rod stuffing boxes (PRSBs); a major gas leak is a detection of > 10,000 ppmv as methane; a minor gas leak is a detection of 1,000 to 10,000 ppmv as methane when the component is in liquid service; a minor gas leak is a detection of 1,000 to 10,000 ppmv as methane when the component is in gas/vapor service. [District Rule 4409, 5.1.1] Y
- {3325} Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4409, 5.1.2] Y
- {3326} Minor gas leaks from PRSBs detected during any District inspection shall not be counted toward determination of compliance with this rule provided the permittee repairs, replaces, or removes leaking PRSBs from VOC service as soon as practicable but not later than seven calendar days. [District Rule 4409, 5.1.3.1.2] Y
- {3327} Leaks detected during quarterly operator inspections shall not be counted towards determination of compliance with the provisions of Rule 4409 provided the leaking components are repaired as soon as practicable but not later than the time frame specified in this permit. Leaks detected during quarterly operator inspections that are not repaired,

replaced, or removed from operation as soon as practicable but not later than the time frame specified in this rule shall be counted toward determination of compliance with the provisions of Rule 4409. [District Rule 4409, 5.1.3.2.1 and 5.1.3.2.2] Y

- {3328} Leaking components at this facility detected during annual operator inspections, as required by Rule 4409 for a specific component type, that exceed the leak standards specified in this permit, shall constitute a violation of this rule. This violation is regardless of whether or not the leaking components are repaired, replaced, or removed from operation within the allowable repair time frame specified in this permit. [District Rule 4409, 5.1.3.2.3] Y
- {3329} An open-ended line, or a valve located at the end of the line, that is not sealed with either a blind flange, a plug, a cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended line is a leak. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4409, 5.1.4.1] Y
- {3330} A leak from a component is when there is a major liquid leak from the component. A major liquid leak from a component is when a visible mist or a continuous flow of liquid, that is not seal lubricant, leaks from the component. [District Rule 4409, 5.1.4.2] Y
- {3331} A leak from a component is when gas emissions greater than 50,000 ppmv, as methane, leaks from the component. [District Rule 4409, 5.1.4.3] Y
- {3332} A minor liquid leak from a component is when more than three drops of liquid per minute, that is not seal lubricant and is not a major liquid leak, leaks from the component. [District Rule 4409, 5.1.4.4] Y
- {3333} When 200 or fewer valves are inspected, a leak from a valve is when more than one valve has a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 valves are inspected, a leak from a valve is when more than 0.5 % (rounded up to the nearest whole number) of the valves have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4] Y
- {3334} When 200 or fewer threaded connections are inspected, a leak from a threaded connection is when more than one threaded connection has a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 threaded connections are inspected, a leak from a threaded connection is when more than 0.5 % (rounded up to the nearest whole number) of the threaded connections have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4] Y
- {3335} When 200 or fewer flanges are inspected, a leak from a flange is when more than one flange has a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 flanges are inspected, a leak from a flange is when more than 0.5 % (rounded up to the nearest whole number) of the flanges have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4] Y
- {3336} When 200 or fewer pumps are inspected, a leak from a pump is when more than two pumps have a minor liquid leak, a minor gas leak, or a gas leak greater than 10,000 ppmv and less than or equal to 50,000 ppmv. When greater than 200 pumps are inspected, a leak from a pump is when more than 1.0 % (rounded up to the nearest whole number) of the

pumps have a minor liquid leak, a minor gas leak, or a gas leak greater than 10,000 ppmv and less than or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4] Y

- {3337} When compressors, PRDs, or other components not specified in this permit are inspected, a leak from these components is when more than one component has a minor liquid leak, a minor gas leak, or a gas leak greater than 10,000 ppmv and less than or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4] Y
- {3338} When 200 or fewer PRSBs are inspected, a leak is when more than four have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 PRSBs are inspected, a leak is when more than 2.0 % (rounded up to the nearest whole number) of the PRSBs have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4] Y
- {3339} When 200 or fewer wells at light crude oil or gas production facilities are inspected, a leak from a pipe is when more than two or more pipes have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 wells at light crude oil or gas production facilities are inspected, a leak from a pipe is when more than 1.0 % (rounded up to the nearest whole number) of the pipes have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4] Y
- {3340} When pipes at natural gas processing facilities are inspected, a leak from a pipe is when more than two have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4] Y
- {3341} For manned facilities all accessible operating pumps, compressors, and PRDs, in service, shall be audio-visually inspected for leaks at least once every 24 hours except when operators do not report to the facility during a 24 hour period. [District Rule 4409, 5.2.1] Y
- {3342} For unmanned facilities all accessible operating pumps, compressors, and PRDs, in service, shall be audio-visually inspected for leaks at least once per calendar week. [District Rule 4409, 5.2.2] Y
- {3343} All accessible operating pumps, compressors, and PRDs, in service, that are found to be leaking by audio-visual inspection shall be attempted to be repaired immediately. The leaking component shall then be tested within 24 hours and, if found leaking again, shall be repaired as soon as practicable but not later than the timeframe specified in this permit. [District Rule 4409, 5.2.3] Y
- {3344} Except for inaccessible components, unsafe-to-monitor components, or pipes, all components, in service, shall be tested for leaks at least once every calendar quarter. [District Rule 4409, 5.2.4] Y
- {3345} All new, replaced, or repaired fittings, flanges, and threaded connections shall be tested for leaks immediately after being placed into service. [District Rule 4409, 5.2.5] Y
- {3346} All inaccessible cornponents shall be tested for leaks at least once every 12 months. [District Rule 4409, 5.2.6] Y
- {3347} All unsafe-to-monitor components shall be tested for leaks during each turnaround. [District Rule 4409, 5.2.7] Y
- {3348} All pipes shall be visually inspected for leaks at least once every 12 months. [District Rule 4409, 5.2.8] Y
- {3349} All pipes, in service, that are found to be leaking by visual inspection shall be attempted to be repaired immediately. The leaking pipe shall then be tested within 24 hours and, if found leaking again, shall be repaired as soon as practicable but not later than the timeframe specified in this permit. [District Rule 4409, 5.2.8.1] Y

- {3350} The annual pipe inspection required by either the Department of Oil, Gas, and Geothermal Resources (DOGGR) pursuant to California Code of Regulation Title 14, Division 2, Subchapter 2, Section 1774 (Oilfield Facilities and Equipment Maintenance), or by the Spill Prevention Control and Countermeasure Plan (SPCC) pursuant to 40 Code of Federal Regulation Part 112 (Oil Prevention and Response: Non- Transportation-Related Onshore and Offshore Facilities) can be used as the annual pipe inspection required by District Rule 4409. [District Rule 4409, 5.2.8.2] Y
- {3351} Except for pumps, compressors, and PRDs, the permittee may apply for written approval from the District to change the inspection frequency of accessible components from quarterly to annually for a specific component type provided the following two qualifying requirements are met. During the previous five consecutive quarterly inspections, for the specific component type, there shall be no more leaks than as allowed by this permit. The permittee also shall not have received a Notice of Violation (NOV) from the District during the previous 12 months for violating any provisions of District Rule 4409 for the specific component type. If these two qualifying requirements have not been met, then the inspection frequency shall revert back to quarterly. The written request shall include pertinent documentation to demonstrate that the operator has successfully met the two qualifying requirements. [District Rule 4409, 5.2.9 and 5.2.10] Y
- {3352} The permittee shall notify the District in writing within five calendar days after changing the inspection frequency for a specific component type. The written notification shall include the reason(s) and date of change to a quarterly inspection frequency. [District Rule 4409, 5.2.11] Y
- {3353} A PRD that releases to the atmosphere shall be inspected by the permittee for leaks as soon as practicable but not later than 24 hours after the time of the release. The permittee shall reinspect the PRD for leaks not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the initial release. If the PRD is found by the permittee to be leaking during either inspection, the PRD leak shall be treated as if the leak was found during the required quarterly operator inspections. [District Rule 4409, 5.2.12] Y
- {3354} Except for PRDs, a component shall be inspected for leaks not later than 15 calendar days after repairing the leak or replacing the component. [District Rule 4409, 5.2.13] Y
- {3355} District inspections shall not be counted as an operator inspection required by District Rule 4409. Any attempt by an operator to count such District inspections as part of the operator's mandatory inspections is considered a willful circumvention of the rule and is a violation of this rule. [District Rule 4409, 5.2.14] Y
- {3356} The operator, upon detection of a leaking component, shall affix to that component a weatherproof, readily visible tag, bearing the date and time when the leak was detected and the date and time of the leak measurement. For gaseous leaks, the tag shall indicate the leak concentration in ppmv. For liquid leaks, the tag shall indicate whether it is a major liquid leak or a minor liquid leak. The tag shall indicate, when applicable, whether the component is an essential component, an unsafe-to-monitor component, or a critical component. The tag shall remain in place until the leaking component is repaired or replaced and reinspected and found to be in compliance with the requirements of this rule. [District Rule 4409, 5.3.1] Y
- {3357} The operator shall minimize all component leaks immediately, to the extent possible, but not later than one hour after detection of the leak in order to stop or reduce leakage to the atmosphere. If the leak has been minimized but the leak still exceeds the applicable leak standards specified in this permit, the operator shall do one of the following within the

timeframes specified within this permit: 1) repair or replace the leaking component; 2) vent the leaking component to a closed vent system; 3) or remove the leaking component from operation. A closed vent system is a District approved system that is not open to the atmosphere. It 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 a District approved control device that has a overall VOC collection and destruction or removal efficiency of at least 95%, or that transports gases or vapors back to a process system. [District Rule 4409, 5.3.4 and 5.3.5] Y

- {3358} The operator shall repair minor gas leaks within seven days. The operator shall repair major gas leaks, which are > 10,000 ppmv but < or equal to 50,000 ppmv, within three days. The operator shall repair major gas leaks, which are > 50,000 ppmv, within two days. The operator shall repair minor liquid leaks within three days. The operator shall repair major liquid leaks within two days. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period. The start of the repair period shall be the time of the initial leak detection. [District Rule 4409, 5.3.4 and 5.3.5] Y
- {3359} For each calendar quarter, the operator may extend the repair period for a total number of leaking components, not to exceed 0.05 % of the number of components inspected, by type, rounded upward to the nearest whole number. The repair period for minor gas leaks can be extended by seven additional days. The repair period for major gas leaks, which are > 10,000 ppmv but < or equal to 50,000 ppmv, can be extended by two additional days. [District Rule 4409, 5.3.5] Y
- {3360} If a leaking component is an essential component or a critical component and which cannot be shut down immediately for repairs, the operator shall do the following: 1) minimize the leak within one hour after detection of the leak; 2) and if the leak has been minimized, but the leak still exceeds the applicable leak standards of Rule 4409 as specified in this permit, the essential component or critical component shall be repaired or replaced to eliminate the leak during the next process unit turnaround. The repair shall occur no later than one year from the date of the original leak detection. [District Rule 4409, 5.3.6] Y
- {3361} For any component that has incurred five repair actions for major gas leaks or major liquid leaks, or a combination of major gas leaks and major liquid leaks within a continuous 12-month period, the operator shall do one of the following four options. Options 1a through 1f require written notification to the District, option 2 requires written notification to the District and written District approval, options 3 and 4 do not require written notification to the District: 1a) For compressors replace the existing seal with either a dual mechanical seal, an oil film seal, a gas seal, or a face-type seal; 1b) for pumps replace the pump with a seal-less pump or replace the seal with a dual mechanical seal; 1c) for PRDs replace the PRD and install a rupture disc in the line which precedes the PRD such that the PRD is in series with and follows the rupture disc; 1d) for valves replace the valve with a sealed bellows valve, or for seal rings install graphite or Teflon chevron seal rings in a live-loaded packing gland; 1e) for threaded connections weld the connections or replace threaded connections with flanges; 1f) for sampling connections replace the sampling connection with a closed-loop sampling system; 2) Replace the component with Achieved-in-Practice Best Available Control Technology (BACT) equipment; 3) Vent the component to a District approved closed-vent system; 4) Remove the component from operation. For any component that is accessible, is not unsafe-to-monitor, is not an essential component, or is not a critical component, the operator shall comply with these requirements as soon as practicable but not later than twelve months after the date of detection of the fifth major leak within a continuous 12-month period. For any component that is inaccessible, is unsafe-to-monitor,

is essential, or is a critical component, the operator shall comply with these requirements as soon as practicable but not later than the next turnaround or not later than two years after the date of detection of the fifth major leak within a continuous 12-month period, whichever comes first. [District Rule 4409, 5.3.7] Y

- {3362} All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and recordkeeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other system approved by the District that enables an operator or the District to locate each individual component. The operator shall replace physical identifications that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. [District Rule 4409, 5.4.1] Y
- {3363} The operator shall keep a copy of the District approved Operator Management Plan (OMP) at the facility and make it available to the District, ARB, and EPA upon request. [District Rule 4409, 6.1.2] Y
- {3364} By January 30th of each year the operator shall submit to the District for approval, in writing, an annual report indicating any changes to the existing OMP on file at the District. [District Rule 4409, 6.1.4] Y
- {3365} The operator shall maintain an inspection log that has been signed and dated by the facility operator responsible for the inspection, certifying the accuracy of the information recorded in the log. The inspection log shall contain, at a minimum, all of the following information: 1) The total number of components inspected, and the total number and percentage of leaking components found by component types; 2) The location, type, name or description of each leaking component and the description of any unit where the leaking component is found; 3) Date of the leak detection and method of the leak detection; 4) For gaseous leaks, record the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak; 5) The date of repair, replacement, or removal from operation of the leaking component(s); 6) The identification and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes first; 7) The method(s) used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier; 8) The date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced; 9) The inspector's name, business mailing address, and business telephone number. [District Rule 4409, 6.2.1] Y
- {3366} Records of leaks detected during quarterly or annual operator inspections, and each subsequent repair and re-inspection, shall be submitted to the District, ARB, and EPA upon request. [District Rule 4409, 6.2.2] Y
- {3367} Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components. The records shall include a copy of the current calibration gas certification from the vendor of the calibration gas cylinder, the date of calibration, the concentration of calibration gas, the instrument reading of calibration gas before adjustment, the instrument reading of calibration gas after adjustment, the calibration gas expiration date, and the calibration gas cylinder pressure at the time of calibration. [District Rule 4409, 6.2.3] Y
- {3368} All records required by this permit shall be retained on-site for a minimum of five years and made available for District, ARB, and EPA inspection upon request. [District Rule 4409, 6.2.4] Y

- {3369} All measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instructions not more than 30 days prior to its use. [District Rule 4409, 6.3.1] Y
- {3370} The VOC content by weight percent shall be determined using ASTM D-1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 for liquids. [District Rule 4409, 6.3.2] Y
- {3371} The percent by volume liquid evaporated at 302 °F (150 °C) shall be determined using ASTM D-86. [District Rule 4409, 6.3.3] Y
- {3372} The TVP of any organic liquid shall be determined by measuring the Reid Vapor Pressure (RVP) using ASTM D-323, and converting the RVP to TVP at the maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance with the procedures specified in Appendix A of District Rule 4409. [District Rule 4409, 6.3.4] Y
- {3373} The API gravity of crude oil or petroleum distillate shall be determined by using ASTM D-287 or ASTM 1298. Sampling for API gravity shall be performed in accordance with ASTM D-4057. [District Rule 4409, 6.3.5] Y
- {3374} The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4409, 6.3.6] Y
- {3375} Halogenated exempt compounds shall be analyzed by EPA Method 18 or ARB Method 422. [District Rule 4409, 6.3.7] Y

Instead of listing each of these conditions on each permit individually, the following condition will be listed on each permit.

- This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409]

In addition, all conditions that are currently listed on the permits from Rule 4403, *Components Serving Light Crude Oil Or Gases At Light Crude Oil And Gases Production Facilities And Components At Natural Gas Processing Facilities, 4/20/05* (which is expired and has been replaced with Rule 4409) are no longer applicable and will be removed.

Rule 4702 Internal Combustion Engines - Phase 2

The purpose of this rule is to limit the emissions of nitrogen oxides (NO_x), carbon monoxide (CO), and volatile organic compounds (VOC) from internal combustion engines, and it applies to any internal combustion engine with a rated brake horsepower greater than 50 horsepower. This includes all Waukesha internal combustion compressor engines S-2234-123-2 thru 137-2.

According to the original project S1032982, these are rich burn natural gas-fired IC engines.

Emissions Limits
Section 5.1, Table 1 Section 1.c. requires that these engines meet the following emissions limits: 25 ppmv NO_X @ 15% O_2, 2000 ppmv CO @ 15% O_2 and 250 ppmv VOC @ 15% O_2. Since the engines are currently permitted at 5 ppmv·NO_x, 25 ppmv·VOC and 56 ppmv·CO @ 15% O_2, continued compliance with Section 5.1 is expected.

Monitoring
Section 5.6 requires the following. For each engine with a rated brake horsepower of 1,000 hp or greater and which is allowed by Permit-to-Operate or Permit-Exempt Equipment Registration condition to operate more than 2,000 hours per calendar year, or with an external emission control device, either install, operate, and maintain continuous monitoring equipment for NOx, CO, and oxygen, as identified in Rule 1080 (Stack Monitoring), or install, operate, and maintain APCO-approved alternate monitoring consisting of one or more of the following:

- Periodic NO_x and CO emission concentrations,
- Engine exhaust oxygen concentration,
- Air-to-fuel ratio,
- Flow rate of reducing agents added to engine exhaust,
- Catalyst inlet and exhaust temperature,
- Catalyst inlet and exhaust oxygen concentration,
- Other operational characteristics.

These engines are all greater than 1,000 horsepower and are allowed to operate full time. In accordance with District Policy SSP 1810 *Emissions Monitoring for Rules 4701 and 4702*, the following conditions will be retained on the engine permits.

- The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702, 5.6.1 and 5.6.9] Y
- If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rule 4702, 5.6.1] Y

- All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702, 5.6.1 and 5.6.9] Y
- The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702, 6.2.1] Y

In addition, the following recordkeeping condition will be retained, except that the rule reference will be changed from District NSR Rule to District Rule 1070.

- The results of the measurements taken with the District approved analyzer shall be maintained on the premises at all times. [District Rule 1070] Y

Elapsed Time Meter
Section 5.6.6 requires that each engine shall have a non-resettable operating time meter. Therefore, the following condition shall be retained on each engine permit.

- The permittee shall install and operate a nonresettable elapsed operating time meter. The elapsed operating time meter shall be properly maintained in accordance with the manufacturer's specifications. [District Rule 4702, 5.6.6] Y

Emission Control Plan
Section 6.1 requires that the owner of an engine to submit to the APCO an emission control plan of all actions to be taken to satisfy the emission requirements of Section 5.1 and the compliance schedules of Section 7.0.

The engines are in compliance with Section 5.1, therefore no emission control plan is required and continued compliance with Section 6.1 is expected.

Operating Log
Section 6.2 requires that the owner of an engine subject to the requirements of this rule shall maintain an engine operating log to demonstrate compliance with this rule. This information shall be retained for a period of at least five years, shall be readily available, and be made available to the APCO upon request. The engine operating log shall include, on a monthly basis, the following information:

- Total hours of operation,
- Type and quantity (cubic feet of gas or gallons of liquid) of fuel used,
- Maintenance or modifications performed,
- Monitoring data,
- Compliance source test results, and

- Any other information necessary to demonstrate compliance with this rule.

Therefore, the following condition will be retained on the permits to ensure compliance:

- The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type, quantity (cubic feet of gas or gallons of liquid) and sulfur content of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 2201 and 4702, 6.2.1]

Section 6.2.2 requires that the data collected pursuant to the requirements of Section 5.6 shall be maintained for at least five years, shall be readily available, and made available to the APCO upon request. Therefore, the following condition will be listed on the permits to ensure compliance:

- All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4702, 6.2] N

Source Testing
Section 6.3 requires the owner of an engine subject to the requirements of Sections 5.1 to conduct emissions source testing with the engine operating either at conditions representative of normal operations or conditions specified in the Permit-to-Operate (every 24 months (Section 6.3.2.1)). However, since these engines are all externally controlled with a catalyst to meet BACT, District Policy APR 1705, *Source Testing Frequency*, the source testing frequency shall remain as currently permitted every twelve (12) months.

For emissions source testing performed pursuant to Section 6.3.1 for the purpose of determining compliance with an applicable standard or numerical limitation, the arithmetic average of three (3) 30-consecutive-minute test runs shall apply. If two (2) of three (3) runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC shall be reported as methane. VOC, NO_x, and CO concentrations shall be reported in ppmv, corrected to 15 percent oxygen.

Since the permits currently require the engines to source-test every year, the following conditions will be retained on the permits to ensure compliance.

- Source testing to measure the stack NOx, CO, and VOC emissions from this unit shall be conducted not less than once every twelve (12) months. [District Rule 2201]
- Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702, 6.3.3]
- Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
- The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or

3A or ARB Method 100, VOC (ppmv) - EPA Method 25A or 25B or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rules 1081 and 4702, 6.4]

- For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. NOx, CO and VOC concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702, 6.3.3]
- Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080]
- The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080]

Inspection and Maintenance Plan
Section 6.5 requires that the owner of an engine subject to the emission limits in Section 5.1 shall submit to the APCO for approval, an I&M plan that specifies all actions to be taken to satisfy the requirements of Section 5.6 and 6.5.

Therefore, the following conditions will be retained on the engine permits to ensure compliance.

- This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702, 6.5] Y
- The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.9] Y

Continued compliance with Rule 4702 is expected.

Rule 4801 Sulfur Compounds

The purpose of this rule is to limit the emissions of sulfur compounds and shall apply to any discharge to the atmosphere of sulfur compounds, which would exist as a liquid or a gas at standard conditions. Therefore, all of the internal combustion engines S-2234-123-2 thru 137-2 are subject to this rule.

Section 3.1 requires that a person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: two-tenths (0.2) percent by volume calculated as sulfur dioxide (SO_2), on a dry basis averaged over 15 consecutive minutes.

Using the ideal gas equation and the highest SO_x emission factor presented in Section VII above, the sulfur compound emissions can be calculated as follows:

$$Volume SO_2 = \frac{n \cdot R \cdot T}{P} \times O_2 \, correction$$

Where

n = moles SO_2

T = (Standard Temperature) = 60°F = 520°R

P = (Standard Pressure) = 14.7 psi

R = (Universal Gas Constant) = $\frac{10.73 \, psi \cdot ft^3}{lb \cdot mol \cdot °R}$

O_2 Correction (3% O_2) = $\frac{20.9 - 3}{20.9}$

$$\frac{0.0084 \, lb \cdot SOx}{MMBtu} \times \frac{1 \, MMBtu}{8{,}578 \, dscf} \times \frac{1 \, lb \cdot mol}{64 \, lb} \times \frac{10.73 \, psi \cdot ft^3}{lb \cdot mol \cdot °R} \times \frac{520°R}{14.7 \, psi} \times \frac{1{,}000{,}000 \cdot parts}{million} \times \frac{20.9 - 3}{20.9} = 5 \frac{parts}{million}$$

Since 5 ppmv < 2,000 ppmv, compliance with this rule is expected.

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

To ensure compliance, the requirement that the portable compressor skids shall not operate within 1,000 feet of a K-12 school shall be retained on those permits.

California Environmental Quality Act (CEQA)

The District performed an Engineering Evaluation (this document) for the proposed project and determined that the activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. The District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15031 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Upon successful completion of the 30-day Public Notice and 45-day EPA COC Notice, issue ATC's S-2234-122-2, 123-2, 24-2, 125-3, 126-2, 127-2, 128-2, 129-2, 130-1, 131-1, 132-1, 133-1, 134-1, 135-1, 136-1, 137-2, 139-2, 140-2, 141-2, 142-2, 143-2, 144-2, 145-2, 147-2, 150-2, 151-2, 153-2, 154-2, 157-1, 158-1, 1591, 160-1, 161-1, 162-1, 163-1, 164-1, 165-1, 166-1, 167-1, 172-1, 175-1, 176-1, 180-1, 181-1, 196-1, 197-1, 200-1, 201-1, 202-1, 203-1 subject to the conditions listed on the draft ATCs in Appendix G.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
S-2234-122-2	3020-2-e	1.5 MMBtu/hr	$412
S-2234-123-2	3020-10-f	1,823 hp ice	$749
S-2234-124-2	3020-10-f	1,823 hp ice	$749
S-2234-125-3	3020-10-f	1,823 hp ice	$749
S-2234-126-2	3020-10-f	1,823 hp ice	$749
S-2234-127-1	3020-10-f	1,823 hp ice	$749
S-2234-128-2	3020-10-f	1,823 hp ice	$749
S-2234-129-2	3020-10-f	1,823 hp ice	$749
S-2234-130-1	3020-10-f	1,823 hp ice	$749
S-2234-131-1	3020-10-f	1,823 hp ice	$749
S-2234-132-1	3020-10-f	1,823 hp ice	$749
S-2234-133-1	3020-10-f	1,823 hp ice	$749
S-2234-134-1	3020-10-f	1,823 hp ice	$749
S-2234-135-1	3020-10-f	1,823 hp ice	$749
S-2234-136-1	3020-10-f	1,823 hp ice	$749
S-2234-137-2	3020-10-f	1,823 hp ice	$749
S-2234-139-2	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-140-2	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-141-2	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-142-2	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-143-2	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-144-2	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-145-2	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-147-2	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-150-2	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-151-2	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-152-2	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-153-2	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-154-2	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-157-1	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-158-1	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-159-1	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-160-1	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-161-1	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-162-1	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-163-1	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-164-1	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-165-1	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-166-1	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-167-1	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-172-1	3020-02-E	1.5 MMBtu/hr	$412
S-2234-175-1	3020-01-C	< 100 electric motor hp	$197
S-2234-176-1	3020-01-G	< 1,600 electric motor hp	$815

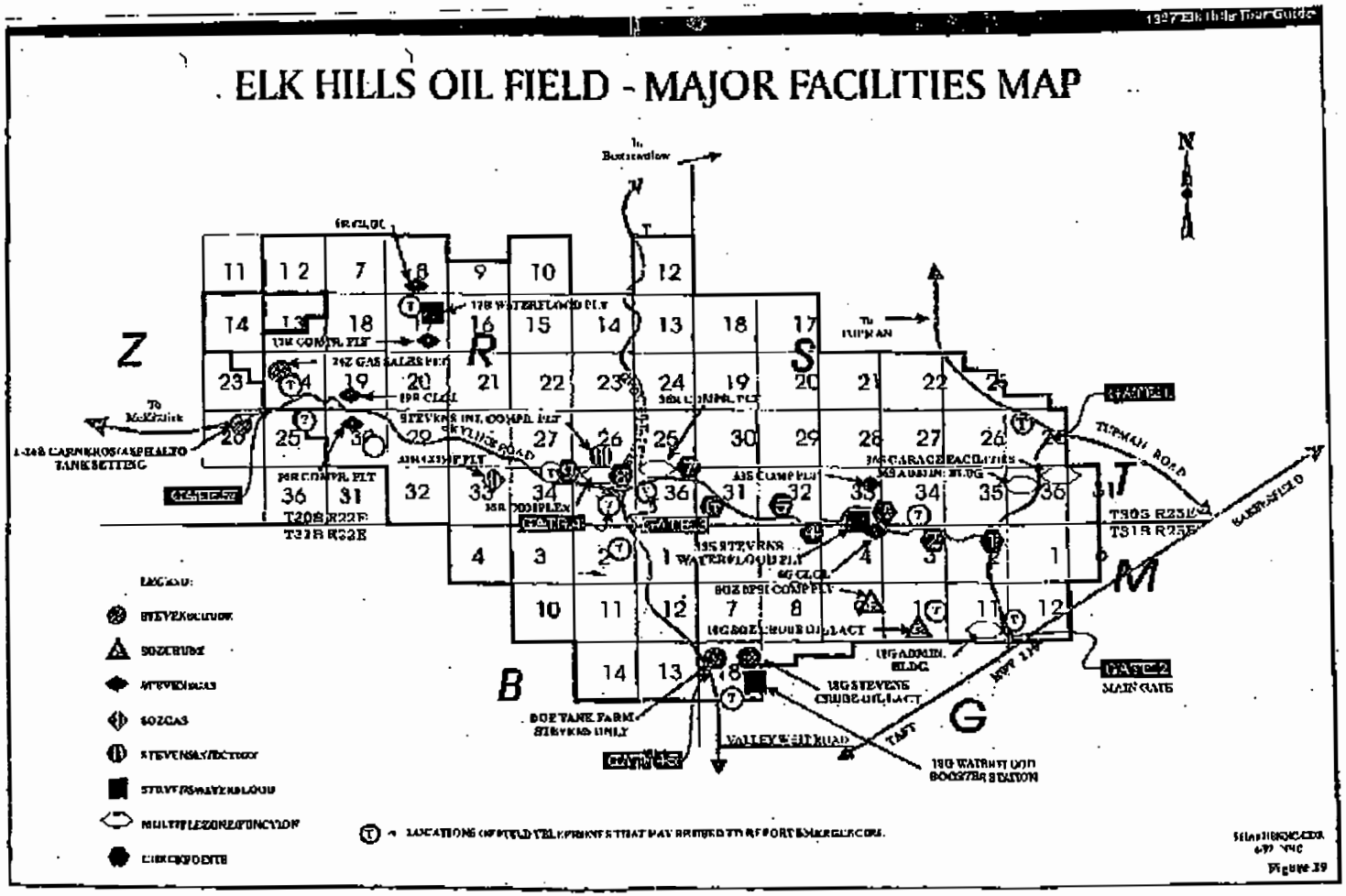
S-2234-180-1	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-181-1	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-196-1	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-197-1	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-200-1	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-201-1	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-202-1	3020-01-h	1,600+ electric motor hp	$1,030
S-2234-203-1	3020-01-h	1,600+ electric motor hp	$1,030

Appendixes

A: Pre-Project Base Documents
B: Facility Diagram
C: Pre-Project and Post Project Fugitive Emissions for All Units
D: Waukesha Engine Combustion Emissions
E: Risk Management Review
F: Emission Profiles
G: Draft ATCs

Appendix A
Pre-Project Base Documents

Appendix B
Facility Diagram



Appendix C: Fugitive PE1 and PE2 for All Units

The PE1 and PE2 for each unit will be calculated and presented in 2 spreadsheets, and then the IPE will be calculated beneath the second spreadsheet.

S-2234-122-1 Fugitive Emissions from Glycol Dehydrator Skid

Occidental
Pre-project Glycol dehydrator skid

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions
of Fugitive Hydrocarbon Leaks at Petroleum Facilities
Table IV-2c. Oil and Gas Production
Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	50 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	50 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC < 10,000 ppmv (lb/day/source)	Screening Value EF - TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	74	0	1.852E-03	7.333E+00	0.07
	Light Crude Oil	59	0	1.005E-03	3.741E+00	0.03
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	9	0	7.778E-03	7.281E+00	0.04
	Light Crude Oil	0	0	6.931E-03	3.757E-01	0.00
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	37	0	6.349E-04	1.370E+00	0.01
	Light Crude Oil	48	0	5.291E-04	1.238E+00	0.01
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	81	0	1.482E-03	3.228E+00	0.06
	Light Crude Oil	55	0	1.270E-03	1.376E+01	0.03
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.2525 lb/day
92.2 lb/year

S-2234-122-2 Fugitive Emissions from Glycol Dehydrator Skid

Occidental
Post-project Glycol dehydrator skid

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions
of Fugitive Hydrocarbon Leaks at Petroleum Facilities
Table IV-2c. Oil and Gas Production
Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	100 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC < 10,000 ppmv (lb/day/source)	Screening Value EF - TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	74	0	1.852E-03	7.333E+00	0.14
	Light Crude Oil	59	0	1.005E-03	3.741E+00	0.06
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	9	0	7.778E-03	7.281E+00	0.07
	Light Crude Oil	0	0	6.931E-03	3.757E-01	0.00
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	37	0	6.349E-04	1.370E+00	0.02
	Light Crude Oil	48	0	5.291E-04	1.238E+00	0.03
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	81	0	1.482E-03	3.228E+00	0.12
	Light Crude Oil	55	0	1.270E-03	1.376E+01	0.07
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.5051 lb/day
184.4 lb/year

Project 1020743
Glycol Dehydrator Skid -122
Difference: 0.5051 lb/day - 0.2521 lb/day = 0.0.253 lb/day (92 lb/yr)

S-2234-123-0, 124-0, 125-0, 126-0, 127-0, 128-0, 129-0, 130-0, 131-0, 132-0, 133-0, 134-0, 135-0, 136-0, 137-0: Fugitive Emissions from Waukesha Engines

Occidental
Pre--Project Engines

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions
of Fugitive Hydrocarbon Leaks at Petroleum Facilities
Table IV-2c. Oil and Gas Production
Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	50 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC < 10,000 ppmv (lb/day/source)	Screening Value EF - TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	17	0	1.852E-03	7.333E+00	0.02
	Light Crude Oil	40	0	1.005E-03	3.741E+00	0.04
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	2	0	7.778E-03	7.281E+00	0.01
	Light Crude Oil	1	0	6.931E-03	3.757E-01	0.01
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	225	0	6.349E-04	1.370E+00	0.07
	Light Crude Oil	200	0	5.291E-04	1.238E+00	0.11
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	135	0	1.482E-03	3.228E+00	0.10
	Light Crude Oil	85	0	1.270E-03	1.376E+01	0.11
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.4559 lb/day
166.4 lb/year

S-2234-123-1, 124-1, 125-1, 126-1, 127-1, 128-1, 129-1, 130-1, 131-1, 132-1, 133-1, 134-1, 135-1, 136-1, 137-1: Fugitive Emissions from Waukesha Engines

Occidental
Post--Project Engines

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions
of Fugitive Hydrocarbon Leaks at Petroleum Facilities
Table IV-2c. Oil and Gas Production
Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	100 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC < 10,000 ppmv (lb/day/source)	Screening Value EF - TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	17	0	1.852E-03	7.333E+00	0.03
	Light Crude Oil	40	0	1.005E-03	3.741E+00	0.04
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	2	0	7.778E-03	7.281E+00	0.02
	Light Crude Oil	1	0	6.931E-03	3.757E-01	0.01
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	225	0	6.349E-04	1.370E+00	0.14
	Light Crude Oil	200	0	5.291E-04	1.238E+00	0.11
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	135	0	1.482E-03	3.228E+00	0.20
	Light Crude Oil	85	0	1.270E-03	1.376E+01	0.11
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.6508 lb/day
237.5 lb/year

Project 1032982
Waukesha Engines - 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137
Difference: 0.6508 lb/day - 0.4559 lb/day = 0.189 lb/day (69 lb/yr)

S-2234-142-1, 143-1, 144-1, 145-1, 147-1: Fugitive Emissions from Electric Compressors

Occidental

Pre–Project Electric Compressors

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions
of Fugitive Hydrocarbon Leaks at Petroleum Facilities
Table IV-2c. Oil and Gas Production
Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	50 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC < 10,000 ppmv (lb/day/source)	Screening Value EF - TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	47	0	1.852E-03	7.333E+00	0.04
	Light Crude Oil	0	0	1.005E-03	3.741E+00	0.00
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	31	0	7.778E-03	7.281E+00	0.12
	Light Crude Oil	0	0	6.931E-03	3.757E-01	0.00
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	500	0	6.349E-04	1.370E+00	0.16
	Light Crude Oil	0	0	5.291E-04	1.238E+00	0.00
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	36	0	1.482E-03	3.228E+00	0.03
	Light Crude Oil	0	0	1.270E-03	1.376E+01	0.00
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.3495 lb/day
127.6 lb/year

S-2234-142-2, 143-2, 144-2, 145-2, 147-2: Fugitive Emissions from Electric Compressors

Occidental
Post--Project Electric Compressors

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions
of Fugitive Hydrocarbon Leaks at Petroleum Facilities
Table IV-2c. Oil and Gas Production
Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	100 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC < 10,000 ppmv (lb/day/source)	Screening Value EF - TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	47	0	1.852E-03	7.333E+00	0.09
	Light Crude Oil	0	0	1.005E-03	3.741E+00	0.00
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	31	0	7.778E-03	7.281E+00	0.24
	Light Crude Oil	0	0	6.931E-03	3.757E-01	0.00
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	500	0	6.349E-04	1.370E+00	0.32
	Light Crude Oil	0	0	5.291E-04	1.238E+00	0.00
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	36	0	1.482E-03	3.228E+00	0.05
	Light Crude Oil	0	0	1.270E-03	1.376E+01	0.00
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.6990 lb/day
255.1 lb/year

Project 1033015 (A)
Electric Compressors - 142-2, 143-2, 144-2, 145-2, 147-2
Difference: 0.6990 lb/day - 0.3495 lb/day = 0.350 lb/day (128 lb/yr)

S-2234-139-1, 140-1, 141-1, 150-1, 151-1, 152-1 ,153-1, 154-1: Fugitive Emissions from Electric Reciprocating Compressors

Occidental

Pre--Project Electric Compressors

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities

Table IV-2c. Oil and Gas Production

Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	50 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC < 10,000 ppmv (lb/day/source)	Screening Value EF - TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	17	0	1.852E-03	7.333E+00	0.02
	Light Crude Oil	40	0	1.005E-03	3.741E+00	0.04
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	2	0	7.778E-03	7.281E+00	0.01
	Light Crude Oil	1	0	6.931E-03	3.757E-01	0.01
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	225	0	6.349E-04	1.370E+00	0.07
	Light Crude Oil	200	0	5.291E-04	1.238E+00	0.11
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	135	0	1.482E-03	3.228E+00	0.10
	Light Crude Oil	85	0	1.270E-03	1.376E+01	0.11
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.4559 lb/day
166.4 lb/year

S-2234-139-2, 140-2, 141-2, 150-2, 151-2, 152-2 ,153-2, 154-2: Fugitive Emissions from Electric Reciprocating Compressors

Occidental
Post–Project Electric Compressors

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions
of Fugitive Hydrocarbon Leaks at Petroleum Facilities
Table IV-2c. Oil and Gas Production
Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	100 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC < 10,000 ppmv (lb/day/source)	Screening Value EF - TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	17	0	1.852E-03	7.333E+00	0.03
	Light Crude Oil	40	0	1.005E-03	3.741E+00	0.04
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	2	0	7.778E-03	7.281E+00	0.02
	Light Crude Oil	1	0	6.931E-03	3.757E-01	0.01
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	225	0	6.349E-04	1.370E+00	0.14
	Light Crude Oil	200	0	5.291E-04	1.238E+00	0.11
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	135	0	1.482E-03	3.228E+00	0.20
	Light Crude Oil	85	0	1.270E-03	1.376E+01	0.11
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.6508 lb/day
237.5 lb/year

Project 10330159 (B)
Electric Reciprocating Compressors - 139-2, 140-2, 141-2, 150-2, 151-2, 152-2, 153-2, 154-2
Difference: 0.6508 lb/day - 0.4559 lb/day = 0.195 lb/day (71 lb/yr)

S-2234-157-0, 158-0, 159-0, 160-0: Fugitive Emissions from Electric Reciprocating Compressors

Occidental

4 pre-project electric reciprocating compressors

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions
of Fugitive Hydrocarbon Leaks at Petroleum Facilities
Table IV-2c. Oil and Gas Production
Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	50 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC < 10,000 ppmv (lb/day/source)	Screening Value EF - TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	17	0	1.852E-03	7.333E+00	0.02
	Light Crude Oil	40	0	1.005E-03	3.741E+00	0.04
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	2	0	7.778E-03	7.281E+00	0.01
	Light Crude Oil	1	0	6.931E-03	3.757E-01	0.01
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	225	0	6.349E-04	1.370E+00	0.07
	Light Crude Oil	200	0	5.291E-04	1.238E+00	0.11
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	135	0	1.482E-03	3.228E+00	0.10
	Light Crude Oil	85	0	1.270E-03	1.376E+01	0.11
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.4559 lb/day
166.4 lb/year

S-2234-157-1, 158-1, 159-1, 160-1: Fugitive Emissions from Electric Reciprocating Compressors

Occidental

4 post-project electric reciprocating compressors

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions
of Fugitive Hydrocarbon Leaks at Petroleum Facilities
Table IV-2c. Oil and Gas Production
Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	100 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC < 10,000 ppmv (lb/day/source)	Screening Value EF - TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	17	0	1.852E-03	7.333E+00	0.03
	Light Crude Oil	40	0	1.005E-03	3.741E+00	0.04
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	2	0	7.778E-03	7.281E+00	0.02
	Light Crude Oil	1	0	6.931E-03	3.757E-01	0.01
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	225	0	6.349E-04	1.370E+00	0.14
	Light Crude Oil	200	0	5.291E-04	1.238E+00	0.11
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	135	0	1.482E-03	3.228E+00	0.20
	Light Crude Oil	85	0	1.270E-03	1.376E+01	0.11
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.6508 lb/day
237.5 lb/year

Project 1050952
Electric Reciprocating Compressors - 157-1, 158-1, 159-1, 160-1
Difference: 0.6508 lb/day - 0.4559 lb/day = 0.195 lb/day (71 lb/yr)

S-2234-161-0, 162-0, 163-0, 164-0, 165-0, 166-0, 167-0: Fugitive Emissions from Electric Screw Compressors

Occidental

9 pre-project electric screw compressors

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities

Table IV-2c. Oil and Gas Production

Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	50 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC < 10,000 ppmv (lb/day/source)	Screening Value EF - TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	47	0	1.852E-03	7.333E+00	0.04
	Light Crude Oil	0	0	1.005E-03	3.741E+00	0.00
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	31	0	7.778E-03	7.281E+00	0.12
	Light Crude Oil	0	0	6.931E-03	3.757E-01	0.00
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	500	0	6.349E-04	1.370E+00	0.16
	Light Crude Oil	0	0	5.291E-04	1.238E+00	0.00
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	36	0	1.482E-03	3.228E+00	0.03
	Light Crude Oil	0	0	1.270E-03	1.376E+01	0.00
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.3495 lb/day
127.6 lb/year

S-2234-161-1, 162-1, 163-1, 164-1, 165-1, 166-1, 167-1: Fugitive Emissions from Electric Screw Compressors

Occidental

9 post-project electric screw compressors

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions
of Fugitive Hydrocarbon Leaks at Petroleum Facilities
Table IV-2c. Oil and Gas Production
Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	100 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC < 10,000 ppmv (lb/day/source)	Screening Value EF - TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	47	0	1.852E-03	7.333E+00	0.09
	Light Crude Oil	0	0	1.005E-03	3.741E+00	0.00
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	31	0	7.778E-03	7.281E+00	0.24
	Light Crude Oil	0	0	6.931E-03	3.757E-01	0.00
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	500	0	6.349E-04	1.370E+00	0.32
	Light Crude Oil	0	0	5.291E-04	1.238E+00	0.00
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	36	0	1.482E-03	3.228E+00	0.05
	Light Crude Oil	0	0	1.270E-03	1.376E+01	0.00
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.6990 lb/day
255.1 lb/year

Project 1050952
Electric Screw Compressors - 161-1, 162-1, 163-1, 164-1, 165-1, 166-1, 167-1
Difference: 0.6990 lb/day - 0.3495 lb/day = 0.350 lb/day (128 lb/yr)

S-2252-172-0: Fugitive Emissions from Glycol Dehydrator

Occidental
Pre-project Glycol dehydrator

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions
of Fugitive Hydrocarbon Leaks at Petroleum Facilities
Table IV-2c. Oil and Gas Production
Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	50 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC < 10,000 ppmv (lb/day/source)	Screening Value EF - TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	74	0	1.852E-03	7.333E+00	0.07
	Light Crude Oil	49	0	1.005E-03	3.741E+00	0.05
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	9	0	7.778E-03	7.281E+00	0.04
	Light Crude Oil	10	0	6.931E-03	3.757E-01	0.07
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	37	0	6.349E-04	1.370E+00	0.01
	Light Crude Oil	48	0	5.291E-04	1.238E+00	0.03
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	81	0	1.482E-03	3.228E+00	0.06
	Light Crude Oil	55	0	1.270E-03	1.376E+01	0.07
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.3891 lb/day
142.0 lb/year

S-2252-172-1: Fugitive Emissions from Glycol Dehydrator

Occidental
Post-project Glycol dehydrator

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions
of Fugitive Hydrocarbon Leaks at Petroleum Facilities
Table IV-2c. Oil and Gas Production
Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	100 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC < 10,000 ppmv (lb/day/source)	Screening Value EF - TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	74	0	1.852E-03	7.333E+00	0.14
	Light Crude Oil	49	0	1.005E-03	3.741E+00	0.05
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	9	0	7.778E-03	7.281E+00	0.07
	Light Crude Oil	10	0	6.931E-03	3.757E-01	0.07
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	37	0	6.349E-04	1.370E+00	0.02
	Light Crude Oil	48	0	5.291E-04	1.238E+00	0.03
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	81	0	1.482E-03	3.228E+00	0.12
	Light Crude Oil	55	0	1.270E-03	1.376E+01	0.07
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.5643 lb/day
206.0 lb/year

Project 1054370
Glycol Dehydrator 172-1
Difference: 0.5643 - .3891 = .175 lb/day (64 lb/yr)

S-2522-175-0: Fugitive Emissions from Gas Dehydrator

Occidental
Pre-Project Gas Dehydrator

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions
of Fugitive Hydrocarbon Leaks at Petroleum Facilities
Table IV-2c. Oil and Gas Production
Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	50 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC < 10,000 ppmv (lb/day/source)	Screening Value EF - TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	235	0	1.852E-03	7.333E+00	0.22
	Light Crude Oil	0	0	1.005E-03	3.741E+00	0.00
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	64	0	7.778E-03	7.281E+00	0.25
	Light Crude Oil	0	0	6.931E-03	3.757E-01	0.00
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	860	0	6.349E-04	1.370E+00	0.27
	Light Crude Oil	0	0	5.291E-04	1.238E+00	0.00
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	278	0	1.482E-03	3.228E+00	0.21
	Light Crude Oil	0	0	1.270E-03	1.376E+01	0.00
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.9454 lb/day
345.1 lb/year

S-2522-175-1: Fugitive Emissions from Gas Dehydrator

Occidental
Post-Project Gas Dehydrator

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions
of Fugitive Hydrocarbon Leaks at Petroleum Facilities
Table IV-2c. Oil and Gas Production
Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	100 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC < 10,000 ppmv (lb/day/source)	Screening Value EF - TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	235	0	1.852E-03	7.333E+00	0.44
	Light Crude Oil	0	0	1.005E-03	3.741E+00	0.00
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	64	0	7.778E-03	7.281E+00	0.50
	Light Crude Oil	0	0	6.931E-03	3.757E-01	0.00
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	860	0	6.349E-04	1.370E+00	0.55
	Light Crude Oil	0	0	5.291E-04	1.238E+00	0.00
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	278	0	1.482E-03	3.228E+00	0.41
	Light Crude Oil	0	0	1.270E-03	1.376E+01	0.00
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 1.8909 lb/day
690.2 lb/year

Project 1062951
Gas Dehydrator 175-1
Difference: 1.8909 - .9454 = .946 lb/day (345 lb/yr) (Offsets Required)

S-2234-176-0: Fugitive Emissions from CO_2 Remover

Occidental
Pre-project CO2 Remover

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions
of Fugitive Hydrocarbon Leaks at Petroleum Facilities
Table IV-2c. Oil and Gas Production
Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	50 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC < 10,000 ppmv (lb/day/source)	Screening Value EF - TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	68	0	1.852E-03	7.333E+00	0.06
	Light Crude Oil	0	0	1.005E-03	3.741E+00	0.00
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	31	0	7.778E-03	7.281E+00	0.12
	Light Crude Oil	0	0	6.931E-03	3.757E-01	0.00
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	120	0	6.349E-04	1.370E+00	0.04
	Light Crude Oil	0	0	5.291E-04	1.238E+00	0.00
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	41	0	1.482E-03	3.228E+00	0.03
	Light Crude Oil	0	0	1.270E-03	1.376E+01	0.00
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.2520 lb/day
92.0 lb/year

S-2234-176-1: Fugitive Emissions from CO_2 Remover

Occidental
Pre-project CO2 Remover

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions
of Fugitive Hydrocarbon Leaks at Petroleum Facilities
Table IV-2c. Oil and Gas Production
Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	100 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC < 10,000 ppmv (lb/day/source)	Screening Value EF - TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	68	0	1.852E-03	7.333E+00	0.13
	Light Crude Oil	0	0	1.005E-03	3.741E+00	0.00
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	31	0	7.778E-03	7.281E+00	0.24
	Light Crude Oil	0	0	6.931E-03	3.757E-01	0.00
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	120	0	6.349E-04	1.370E+00	0.08
	Light Crude Oil	0	0	5.291E-04	1.238E+00	0.00
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	41	0	1.482E-03	3.228E+00	0.06
	Light Crude Oil	0	0	1.270E-03	1.376E+01	0.00
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.5040 lb/day
184.0 lb/year

Project 1062951
CO_2 Remover 176-1
Difference = 0.5040 - 0.2520 = 0.252 lb/day (92 lb/yr)

S-2234-180-0, 181-0: Fugitive Emissions from Electric Compressor Skids

Occidental

Pre-Project Electric Compressor Skid

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions
of Fugitive Hydrocarbon Leaks at Petroleum Facilities
Table IV-2c. Oil and Gas Production
Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	50 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC < 10,000 ppmv (lb/day/source)	Screening Value EF - TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	26	0	1.852E-03	7.333E+00	0.02
	Light Crude Oil	50	0	1.005E-03	3.741E+00	0.05
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	3	0	7.778E-03	7.281E+00	0.01
	Light Crude Oil	4	0	6.931E-03	3.757E-01	0.03
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	221	0	6.349E-04	1.370E+00	0.07
	Light Crude Oil	263	0	5.291E-04	1.238E+00	0.14
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	145	0	1.482E-03	3.228E+00	0.11
	Light Crude Oil	95	0	1.270E-03	1.376E+01	0.12
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.5511 lb/day
201.1 lb/year

S-2234-180-1, 181-1: Fugitive Emissions from Electric Compressor Skids

Occidental
Pre-Project Electric Compressor Skid

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions
of Fugitive Hydrocarbon Leaks at Petroleum Facilities
Table IV-2c. Oil and Gas Production
Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	100 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC < 10,000 ppmv (lb/day/source)	Screening Value EF - TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	26	0	1.852E-03	7.333E+00	0.05
	Light Crude Oil	50	0	1.005E-03	3.741E+00	0.05
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	3	0	7.778E-03	7.281E+00	0.02
	Light Crude Oil	4	0	6.931E-03	3.757E-01	0.03
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	221	0	6.349E-04	1.370E+00	0.14
	Light Crude Oil	263	0	5.291E-04	1.238E+00	0.14
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	145	0	1.482E-03	3.228E+00	0.21
	Light Crude Oil	95	0	1.270E-03	1.376E+01	0.12
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.7644 lb/day
279.0 lb/year

Project 1064167
Electric compressor skids 180-1, 181-0
Difference: .7644 - .5511 = 0.213 lb/day (78 lb/yr)

S-2234-196-0 and -1, 197-0 and -1: Fugitive Emissions from Electric Compressor Skids

Note that these two units already have a pre-project VOC/TOC content limit of 100% and a separate spreadsheet is not required.

Occidental

Unadjusted Electric Compressor Skids

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions
of Fugitive Hydrocarbon Leaks at Petroleum Facilities
Table IV-2c. Oil and Gas Production
Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	100 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC < 10,000 ppmv (lb/day/source)	Screening Value EF - TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	47	0	1.852E-03	7.333E+00	0.09
	Light Crude Oil	0	0	1.005E-03	3.741E+00	0.00
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	31	0	7.778E-03	7.281E+00	0.24
	Light Crude Oil	0	0	6.931E-03	3.757E-01	0.00
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	500	0	6.349E-04	1.370E+00	0.32
	Light Crude Oil	0	0	5.291E-04	1.238E+00	0.00
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	36	0	1.482E-03	3.228E+00	0.05
	Light Crude Oil	0	0	1.270E-03	1.376E+01	0.00
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.6990 lb/day
255.1 lb/year

Project 1085185
Compressor skids 196-1, 197-1
Difference = 0

S-2234-200-0: Fugitive Emissions from Electric Reciprocating Compressor Skid

Occidental

Pre-project electric reciprocating compressor

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions
of Fugitive Hydrocarbon Leaks at Petroleum Facilities
Table IV-2c. Oil and Gas Production
Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	50 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC < 10,000 ppmv (lb/day/source)	Screening Value EF - TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	17	0	1.852E-03	7.333E+00	0.02
	Light Crude Oil	40	0	1.005E-03	3.741E+00	0.04
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	2	0	7.778E-03	7.281E+00	0.01
	Light Crude Oil	1	0	6.931E-03	3.757E-01	0.01
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	225	0	6.349E-04	1.370E+00	0.07
	Light Crude Oil	200	0	5.291E-04	1.238E+00	0.11
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	135	0	1.482E-03	3.228E+00	0.10
	Light Crude Oil	85	0	1.270E-03	1.376E+01	0.11
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.4559 lb/day
166.4 lb/year

S-2234-200-1: Fugitive Emissions from Electric Reciprocating Compressor Skid

Occidental

Post-project electric reciprocating compressor

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities

Table IV-2c. Oil and Gas Production

Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	100 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC < 10,000 ppmv (lb/day/source)	Screening Value EF - TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	17	0	1.852E-03	7.333E+00	0.03
	Light Crude Oil	40	0	1.005E-03	3.741E+00	0.04
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	2	0	7.778E-03	7.281E+00	0.02
	Light Crude Oil	1	0	6.931E-03	3.757E-01	0.01
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	225	0	6.349E-04	1.370E+00	0.14
	Light Crude Oil	200	0	5.291E-04	1.238E+00	0.11
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	135	0	1.482E-03	3.228E+00	0.20
	Light Crude Oil	85	0	1.270E-03	1.376E+01	0.11
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.6508 lb/day
237.5 lb/year

Project 1085183
Compressor skids 200-1
Difference = .6508 - .4559 = .1949 lb/day (71 lb/yr)

S-2234-201-0, 202-0, 203-0: Fugitive Emissions from Electric Screw Compressor Skids

Occidental

Pre-project electric screw compressors

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions
of Fugitive Hydrocarbon Leaks at Petroleum Facilities
Table IV-2c. Oil and Gas Production
Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	50 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC < 10,000 ppmv (lb/day/source)	Screening Value EF - TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	47	0	1.852E-03	7.333E+00	0.04
	Light Crude Oil	0	0	1.005E-03	3.741E+00	0.00
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	31	0	7.778E-03	7.281E+00	0.12
	Light Crude Oil	0	0	6.931E-03	3.757E-01	0.00
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	500	0	6.349E-04	1.370E+00	0.16
	Light Crude Oil	0	0	5.291E-04	1.238E+00	0.00
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	36	0	1.482E-03	3.228E+00	0.03
	Light Crude Oil	0	0	1.270E-03	1.376E+01	0.00
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.3495 lb/day
127.6 lb/year

S-2234-201-1, 202-1, 203-1: Fugitive Emissions from Electric Screw Compressor Skids

Occidental
Pre-project electric screw compressors

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions
of Fugitive Hydrocarbon Leaks at Petroleum Facilities
Table IV-2c. Oil and Gas Production
Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	100 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF - TOC < 10,000 ppmv (lb/day/source)	Screening Value EF - TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	47	0	1.852E-03	7.333E+00	0.09
	Light Crude Oil	0	0	1.005E-03	3.741E+00	0.00
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	31	0	7.778E-03	7.281E+00	0.24
	Light Crude Oil	0	0	6.931E-03	3.757E-01	0.00
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	500	0	6.349E-04	1.370E+00	0.32
	Light Crude Oil	0	0	5.291E-04	1.238E+00	0.00
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	36	0	1.482E-03	3.228E+00	0.05
	Light Crude Oil	0	0	1.270E-03	1.376E+01	0.00
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.6990 lb/day
255.1 lb/year

Project 1085183
Compressor skids 201-1, 202-1, 203-1
Difference = .6990 - .3495 = .3525 lb/day (128 lb/yr)

Total Fugitive Emissions for Project

Fugitive Emissions

New ATC	PE1 Day	PE1 An	PE2 Day	PE2 An	Dif lb/day	Dif lb/yr
122-2	0.3300	120.5	0.5050	184.3	0.1750	63.9
123-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
124-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
125-3	0.4559	166.4	0.6508	237.5	0.1949	71.1
126-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
127-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
128-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
129-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
130-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
131-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
132-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
133-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
134-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
135-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
136-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
137-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
139-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
140-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
141-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
142-2	0.3495	127.6	0.6990	255.1	0.3495	127.6
143-2	0.3495	127.6	0.6990	255.1	0.3495	127.6
144-2	0.3495	127.6	0.6990	255.1	0.3495	127.6
145-2	0.3495	127.6	0.6990	255.1	0.3495	127.6
147-2	0.3495	127.6	0.6990	255.1	0.3495	127.6
150-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
151-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
152-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
153-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
154-2	0.4559	166.4	0.6508	237.5	0.1949	71.1
157-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
158-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
159-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
160-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
161-1	0.3495	127.6	0.6990	255.1	0.3495	127.6
162-1	0.3495	127.6	0.6990	255.1	0.3495	127.6
163-1	0.3495	127.6	0.6990	255.1	0.3495	127.6
164-1	0.3495	127.6	0.6990	255.1	0.3495	127.6
165-1	0.3495	127.6	0.6990	255.1	0.3495	127.6
166-1	0.3495	127.6	0.6990	255.1	0.3495	127.6
167-1	0.3495	127.6	0.6990	255.1	0.3495	127.6
172-1	0.3891	142.0	0.5643	206.0	0.1752	63.9
175-1*	0.9454	345.1	1.8909	690.2	0.9455	345.1
176-1	0.2520	92.0	0.5040	184.0	0.2520	92.0
180-1	0.5511	201.2	0.7644	279.0	0.2133	77.9
181-1	0.5511	201.2	0.7644	279.0	0.2133	77.9
196-1	0.6990	255.1	0.6990	255.1	0.0000	0.0
197-1	0.6990	255.1	0.6990	255.1	0.0000	0.0
200-1	0.4559	166.4	0.6508	237.5	0.1949	71.1
201-1	0.3495	127.6	0.6990	255.1	0.3495	127.6
202-1	0.3495	127.6	0.6990	255.1	0.3495	127.6
203-1	0.3495	127.6	0.6990	255.1	0.3495	127.6
Totals	22.42	8,184.9	35.10	12,810.9	12.67	4,626

* Therefore, total offsets = 345 lb/year or about 86 lb/qtr

Appendix D
Waukesha Engine Combustion Emissions

Combustions PE1 and PE2 from the Waukesha engines S-2234-123 thru 137 are taken from Project 1032982 and are presented in the following tables.

The engines are permitted to run at a daily average of 1,232 hp, and this will be enforced by the existing daily fuel usage limit of 241,600 scf/day, which will be enforced by monthly recordkeeping, pursuant to Rules 2201 and 4702, 6.2.1.

Daily Emissions (each engine)								
NO_x	0.076	(g/hp-hr) x	1,232	(hp) x	24	(hr/day) ÷ 453.6 (g/lb) =	5.0	(lb/day)
SO_x	0.011	(g/hp-hr) x	1,232	(hp) x	24	(hr/day) ÷ 453.6 (g/lb) =	0.7	(lb/day)
PM_{10}	0.02	(g/hp-hr) x	1,232	(hp) x	24	(hr/day) ÷ 453.6 (g/lb) =	1.3	(lb/day)
CO	0.52	(g/hp-hr) x	1,232	(hp) x	24	(hr/day) ÷ 453.6 (g/lb) =	33.9	(lb/day)
VOC	0.13	(g/hp-hr) x	1,232	(hp) x	24	(hr/day) ÷ 453.6 (g/lb) =	8.5	(lb/day)

Annual Emissions (each engine)								
NO_x	0.076	(g/hp-hr) x	1,232	(hp) x	8760	(hr/yr) ÷ 453.6 (g/lb) =	1,808	(lb/yr)
SO_x	0.011	(g/hp-hr) x	1,232	(hp) x	8760	(hr/yr) ÷ 453.6 (g/lb) =	262	(lb/yr)
PM_{10}	0.02	(g/hp-hr) x	1,232	(hp) x	8760	(hr/yr) ÷ 453.6 (g/lb) =	476	(lb/yr)
CO	0.52	(g/hp-hr) x	1,232	(hp) x	8760	(hr/yr) ÷ 453.6 (g/lb) =	12,372	(lb/yr)
VOC	0.13	(g/hp-hr) x	1,232	(hp) x	8760	(hr/yr) ÷ 453.6 (g/lb) =	3,093	(lb/yr)

Appendix E
San Joaquin Valley Air Pollution Control District
Risk Management Review

To:	Steve Roeder – Permit Services
From:	Cheryl Lawler – Technical Services
Date:	December 1, 2009
Facility Name:	Occidental of Elk Hills
Location:	S27, T30S, R23E, near Tupman
Application #(s):	S-2234-122-2 thru 203-1
Project #:	S-1094956

A. RMR SUMMARY

RMR Summary			
Categories	**Increased VOC Fugitive Emissions (Units 122-2 thru 203-1)**	**Project Totals**	**Facility Totals**
Prioritization Score	**0.00***	0.00	>1
Acute Hazard Index	N/A	N/A	0.12
Chronic Hazard Index	N/A	N/A	0.04
Maximum Individual Cancer Risk	N/A	N/A	2.46E-06
T-BACT Required?	No		
Special Permit Conditions?	No		

*The prioritization score was determined to be insignificant (less than 0.05); therefore, the effective prioritization score for this project is considered to be 0.00.

I. Project Description

Technical Services received a request on November 13, 2009, to perform a Risk Management Review for increased VOC emissions from TEOR gas that flows through 51 permitted pieces of equipment, such as compressor skids, each with only fugitive emissions.

II. Analysis

Toxic emissions from the equipment were calculated using emission factors for toxic fugitive emissions from oilfield equipment, along with VOC emission rates calculated and supplied by the processing engineer. In accordance with the District's Risk Management Policy for Permitting New and Modified Sources *(APR 1905-1, March 2, 2001), risks from the proposed project were prioritized using the procedures in the 1990 CAPCOA Facility Prioritization Guidelines and incorporated in the District's HEART's database. The prioritization score for the proposed project was less than 1.0 (see RMR Summary Table). Therefore, no further analysis was necessary.*

The following parameters were used for the review:

Analysis Parameters			
Total VOC Fugitive Emissions Rate (lbs/yr)	4626	**Max Hours per Year**	8760
Closest Receptor (m)	1075		

III. *Conclusion*

The prioritization score for this project is not above 1.0. In accordance with the District's Risk Management Policy, the project is approved **without** Toxic Best Available Control Technology (T-BACT).

These conclusions are based on the data provided by the applicant and the project engineer. Therefore, this analysis is valid only as long as the proposed data and parameters do not change.

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-2234-122-1 **EXPIRATION DATE:** 10/31/2009

SECTION: NW36 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
GLYCOL DEHYDRATION SKID MOUNTED UNIT WITH A GLYCOL CONTACTOR, SEPARATOR COALESCER, SEVERAL GLYCOL HEAT EXCHANGERS, REBOILER/REGENERATOR EQUIPPED WITH 1.5 MMBTU/HR BURNER, GLYCOL SURGE TANK, FLASH SEPARATOR, LEAN/RICH GLYCOL EXCHANGER, VARIOUS PUMPS AND FILTERS, WITH PROCESS VENT CONNECTED TO EXISTING VACUUM GAS GATHERING SYSTEM

PERMIT UNIT REQUIREMENTS

1. Only glycol shall be used as the dehydration medium. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Condensate handling shall be conducted in closed systems resulting in fugitive component emissions only. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Components shall be inspected for leaks at least quarterly using a portable hydrocarbon detection instrument. Any vapor leak greater than 7,500 ppmv, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21, or condensate leaking at a rate of greater than 3 drops of liquid per minute shall be repaired in a manner consistent with the procedures specified in Rule 4403 Section 5.1.4, 5.1.5, and 5.1.6. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC content of gas processed shall not exceed 50% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of two years. [District NSR Rule and 1070] Federally Enforceable Through Title V Permit
5. VOC content of gas shall be measured using ASTM D1945-96, EPA Method 25 or EPA Method 18 referenced as methane. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The glycol dehydration system shall not be operated unless all vapors are directed to the vapor recovery system, a fuel gas system or a sales gas system, or a system in which VOC emissions are combusted by a flare, incinerator, reboiler, or thermal oxidizer. [District Rule 4408, 5.1] Federally Enforceable Through Title V Permit
7. The condensed hydrocarbon liquid stream from the glycol dehydration vent shall be stored and handled in a manner that will not cause or allow evaporation of VOC to the atmosphere. [District Rule 4408, 5.2] Federally Enforceable Through Title V Permit
8. A leak is defined as the dripping at a rate of more than three (3) drops per minute of liquid containing VOCs or a reading as methane in excess of 10,000 ppm above background when measured at a distance of one (1) centimeter from the potential source in accordance with EPA Method 21. [District Rules 4403, 3.3.1 and 4408, 3.8.1] Federally Enforceable Through Title V Permit
9. All control systems shall be maintained in a leak-free condition as determined by EPA Method 21. [District Rule 4408, 5.3] Federally Enforceable Through Title V Permit
10. VOC control efficiency shall be no less than 95% by weight. [District Rule 4408, 5.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. Fugitive VOC emission rate, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c less than or equal to 10,000 ppm (Feb 1999), from the total number of gas service components shall not exceed 0.252 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
12. This operation shall comply with the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
13. The operator shall maintain monthly records of the amount of gas dehydrated (MMSCF). [District Rule 4408, 6.1.1] Federally Enforceable Through Title V Permit
14. The operator of any glycol dehydration system shall maintain the following records: facility name and APCD permit number; description of any installed VOC control system; flow diagram of dehydrator and any VOC controls; and maintenance records of the VOC control system. [District Rule 4408, 6.1.2] Federally Enforceable Through Title V Permit
15. The permittee shall make records required by this permit readily available for District inspection upon request and shall be retained on the premises for a period of not less than five years. [District NSR Rule and 4408, 6.1] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-2234-123-1 **EXPIRATION DATE:** 10/31/2009

SECTION: SE26 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-14) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Emissions from this IC engine shall not exceed any of the following limits: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District NSR Rule and District Rule 4702, 5.1] Federally Enforceable Through Title V Permit
5. VOC emissions from fugitive components associated with this engine/compressor shall not exceed 0.46 lb VOC per day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Fugitive VOC emission rate was calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c less than or equal to 10,000 ppm (Feb 1999). [District NSR Rule] Federally Enforceable Through Title V Permit
7. The fuel consumption limit for this engine shall not exceed 241.6 Mscf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District NSR Rule] Federally Enforceable Through Title V Permit
9. If the IC engine is fired on PUC-regulated natural gas, the permittee shall maintain on file, copies of all natural gas bills. [District NSR Rule] Federally Enforceable Through Title V Permit
10. If the engine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District NSR Rule] Federally Enforceable Through Title V Permit
11. If the engine is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

12. The permittee shall install and operate a nonresettable elapsed operating time meter. The elapsed operating time meter shall be properly maintained in accordance with the manufacturer's specifications. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit

13. Source testing to measure the natural gas-combustion NOx, CO, and VOC emissions from this unit shall be conducted not less than once every twelve (12) months. [District NSR Rule and District Rule 4702, 6.3.2] Federally Enforceable Through Title V Permit

14. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit

15. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

16. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25A or 25B or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rules 1081 and 4702, 6.4] Federally Enforceable Through Title V Permit

17. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. NOx, CO and VOC concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit

18. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080] Federally Enforceable Through Title V Permit

19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit

20. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702, 6.5] Federally Enforceable Through Title V Permit

21. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.9] Federally Enforceable Through Title V Permit

22. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

23. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rule 4702, 5.6.1] Federally Enforceable Through Title V Permit

24. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

25. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit

26. The results of the measurements taken with the District approved analyzer shall be maintained on the premises at all times. [District NSR Rule] Federally Enforceable Through Title V Permit

27. Components to be screened shall be identified and categorized according to the following equipment types: connectors, flanges, open-ended lines (sample connections, drains, bleed valves, etc.) pump seals, valves with visible actuators and other (pressure relief devices, compressor seals, meters, etc.). Components shall be further identified and categorized according to the following types of service: gas/light liquid and heavy liquid service. [District NSR Rule] Federally Enforceable Through Title V Permit

28. Components shall be inspected for leaks at least quarterly using a portable hydrocarbon detection instrument. Any vapor leak greater than 7,500 ppmv, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21, or condensate leaking at a rate of greater than 3 drops of liquid per minute shall be repaired in a manner consistent with the procedures specified in Rule 4409. [District NSR Rule] Federally Enforceable Through Title V Permit

29. This operation shall comply with the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409]

30. VOC content of gas processed shall not exceed 50% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of two years. [District NSR Rule and District Rule 1070] Federally Enforceable Through Title V Permit

31. VOC content of gas shall be measured using ASTM D1945-96, EPA Method 25 or EPA Method 18 referenced as methane. [District NSR Rule] Federally Enforceable Through Title V Permit

32. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type, quantity (cubic feet of gas or gallons of liquid) and sulfur content of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District NSR Rule and District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit

33. All records required by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District NSR Rule and District Rules 1070 and 4702, 6.2.1 and 6.2.2] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-2234-124-1 **EXPIRATION DATE:** 10/31/2009

SECTION: SE26 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-15) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Emissions from this IC engine shall not exceed any of the following limits: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District NSR Rule and District Rule 4702, 5.1] Federally Enforceable Through Title V Permit
5. VOC emissions from fugitive components associated with this engine/compressor shall not exceed 0.46 lb VOC per day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Fugitive VOC emission rate was calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c less than or equal to 10,000 ppm (Feb 1999). [District NSR Rule] Federally Enforceable Through Title V Permit
7. The fuel consumption limit for this engine shall not exceed 241.6 Mscf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District NSR Rule] Federally Enforceable Through Title V Permit
9. If the IC engine is fired on PUC-regulated natural gas, the permittee shall maintain on file, copies of all natural gas bills. [District NSR Rule] Federally Enforceable Through Title V Permit
10. If the engine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District NSR Rule] Federally Enforceable Through Title V Permit
11. If the engine is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

12. The permittee shall install and operate a nonresettable elapsed operating time meter. The elapsed operating time meter shall be properly maintained in accordance with the manufacturer's specifications. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit

13. Source testing to measure the natural gas-combustion NOx, CO, and VOC emissions from this unit shall be conducted not less than once every twelve (12) months. [District NSR Rule and District Rule 4702, 6.3.2] Federally Enforceable Through Title V Permit

14. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit

15. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

16. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25A or 25B or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rules 1081 and 4702, 6.4] Federally Enforceable Through Title V Permit

17. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. NOx, CO and VOC concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit

18. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080] Federally Enforceable Through Title V Permit

19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit

20. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702, 6.5] Federally Enforceable Through Title V Permit

21. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.9] Federally Enforceable Through Title V Permit

22. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

23. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rule 4702, 5.6.1] Federally Enforceable Through Title V Permit

24. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

25. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit

26. The results of the measurements taken with the District approved analyzer shall be maintained on the premises at all times. [District NSR Rule] Federally Enforceable Through Title V Permit

27. Components to be screened shall be identified and categorized according to the following equipment types: connectors, flanges, open-ended lines (sample connections, drains, bleed valves, etc.) pump seals, valves with visible actuators and other (pressure relief devices, compressor seals, meters, etc.). Components shall be further identified and categorized according to the following types of service: gas/light liquid and heavy liquid service. [District NSR Rule] Federally Enforceable Through Title V Permit

28. Components shall be inspected for leaks at least quarterly using a portable hydrocarbon detection instrument. Any vapor leak greater than 7,500 ppmv, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21, or condensate leaking at a rate of greater than 3 drops of liquid per minute shall be repaired in a manner consistent with the procedures specified in Rule 4409. [District NSR Rule] Federally Enforceable Through Title V Permit

29. This operation shall comply with the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409]

30. VOC content of gas processed shall not exceed 50% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of two years. [District NSR Rule and District Rule 1070] Federally Enforceable Through Title V Permit

31. VOC content of gas shall be measured using ASTM D1945-96, EPA Method 25 or EPA Method 18 referenced as methane. [District NSR Rule] Federally Enforceable Through Title V Permit

32. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type, quantity (cubic feet of gas or gallons of liquid) and sulfur content of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District NSR Rule and District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit

33. All records required by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District NSR Rule and District Rules 1070 and 4702, 6.2.1 and 6.2.2] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-2234-125-1 **EXPIRATION DATE:** 10/31/2009

SECTION: 27 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-18) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Emissions from this IC engine shall not exceed any of the following limits: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District NSR Rule and District Rule 4702, 5.1] Federally Enforceable Through Title V Permit
5. VOC emissions from fugitive components associated with this engine/compressor shall not exceed 0.46 lb VOC per day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Fugitive VOC emission rate was calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c less than or equal to 10,000 ppm (Feb 1999). [District NSR Rule] Federally Enforceable Through Title V Permit
7. The fuel consumption limit for this engine shall not exceed 241.6 Mscf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District NSR Rule] Federally Enforceable Through Title V Permit
9. If the IC engine is fired on PUC-regulated natural gas, the permittee shall maintain on file, copies of all natural gas bills. [District NSR Rule] Federally Enforceable Through Title V Permit
10. If the engine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District NSR Rule] Federally Enforceable Through Title V Permit
11. If the engine is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

12. The permittee shall install and operate a nonresettable elapsed operating time meter. The elapsed operating time meter shall be properly maintained in accordance with the manufacturer's specifications. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit

13. Source testing to measure the natural gas-combustion NOx, CO, and VOC emissions from this unit shall be conducted not less than once every twelve (12) months. [District NSR Rule and District Rule 4702, 6.3.2] Federally Enforceable Through Title V Permit

14. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit

15. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

16. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25A or 25B or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rules 1081 and 4702, 6.4] Federally Enforceable Through Title V Permit

17. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. NOx, CO and VOC concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit

18. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080] Federally Enforceable Through Title V Permit

19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit

20. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702, 6.5] Federally Enforceable Through Title V Permit

21. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.9] Federally Enforceable Through Title V Permit

22. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

23. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rule 4702, 5.6.1] Federally Enforceable Through Title V Permit

24. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

25. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit

26. The results of the measurements taken with the District approved analyzer shall be maintained on the premises at all times. [District NSR Rule] Federally Enforceable Through Title V Permit

27. Components to be screened shall be identified and categorized according to the following equipment types: connectors, flanges, open-ended lines (sample connections, drains, bleed valves, etc.) pump seals, valves with visible actuators and other (pressure relief devices, compressor seals, meters, etc.). Components shall be further identified and categorized according to the following types of service: gas/light liquid and heavy liquid service. [District NSR Rule] Federally Enforceable Through Title V Permit

28. Components shall be inspected for leaks at least quarterly using a portable hydrocarbon detection instrument. Any vapor leak greater than 7,500 ppmv, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21, or condensate leaking at a rate of greater than 3 drops of liquid per minute shall be repaired in a manner consistent with the procedures specified in Rule 4409. [District NSR Rule] Federally Enforceable Through Title V Permit

29. This operation shall comply with the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409]

30. VOC content of gas processed shall not exceed 50% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of two years. [District NSR Rule and District Rule 1070] Federally Enforceable Through Title V Permit

31. VOC content of gas shall be measured using ASTM D1945-96, EPA Method 25 or EPA Method 18 referenced as methane. [District NSR Rule] Federally Enforceable Through Title V Permit

32. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type, quantity (cubic feet of gas or gallons of liquid) and sulfur content of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District NSR Rule and District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit

33. All records required by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District NSR Rule and District Rules 1070 and 4702, 6.2.1 and 6.2.2] Federally Enforceable Through Title V Permit

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-126-0 **ISSUANCE DATE:** 06/24/2004

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 26 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-21) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
6. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District NSR Rule]

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-2234-126-0 : Feb 16 2010 9:17AM – ROEDERS : Joint Inspection NOT Required

7. The permittee shall install and operate a nonresettable fuel meter and a nonresettable elapsed operating time meter. The owner or operator shall maintain these required meters in proper operating condition. The fuel meter shall be calibrated periodically per the recommendations of the manufacturer. [District Rule 4702]
8. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201]
9. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District NSR Rule]
10. VOC emissions from fugitive components associated with this engine/compressor shall not exceed 0.46 lb VOC per day. [District NSR Rule]
11. Emissions from IC engine shall not exceed any of the following: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District NSR Rule]
12. The fuel consumption limit for this engine shall not exceed 241.6 Mscf/day. [District Rule 2201]
13. Source tests to show compliance with CO, NOx, and VOC emission limits shall be conducted within 60 days of startup and at least once every 12 months thereafter, by District-witnessed sample collection by independent testing laboratory. [District Rule 2201]
14. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080]
15. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081]
16. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080]
17. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25 or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rules 1081, 4701, and 4702]
18. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4701 and 4702]
19. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rules 4701 and 4702]
20. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4701 and 4702]

CONDITIONS CONTINUE ON NEXT PAGE

21. The permittee shall maintain monthly records of the following information: hours of operation, type, quantity and sulfur content of fuel used, maintenance and/or modifications performed, emissions monitoring data and compliance source test results. [District Rules 2201, 4701, and 4702]
22. The portable analyzer shall be calibrated in accordance with manufacturer guidelines and District policy SSP-1810. [District Rules 4701 and 4702]
23. The results of the measurements taken with the District approved analyzer shall be maintained on the premises at all times. [District Rule 2201]
24. If the IC engine is fired on PUC-regulated natural gas, then maintain on file copies of all natural gas bills. [District Rule 2201]
25. If the engine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201]
26. If the engine is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201]
27. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (Amended December 16, 1993), of 3 thirty minute test runs for NOx and CO. [District Rule 1081]
28. Components to be screened shall be identified and categorized according to the following equipment types: connectors, flanges, open-ended lines (sample connections, drains, bleed valves, etc.) pump seals, valves with visible actuators and other (pressure relief devices, compressor seals, meters, etc.). Components shall be further identified and categorized according to the following types of service: gas/light liquid and heavy liquid service. [District Rule 2201]
29. Components shall be inspected for leaks at least quarterly using a portable hydrocarbon detection instrument. Any vapor leak greater than 7,500 ppmv, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21, or condensate leaking at a rate of greater than 3 drops of liquid per minute shall be repaired in a manner consistent with the procedures specified in Rule 4403 Section 5.1.4, 5.1.5, and 5.1.6. [District Rule 2010 and 4403]
30. Fugitive VOC emission rate was calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c less than or equal to 10,000 ppm (Feb 1999). [District Rule 2201]
31. Permittee shall comply in full with all applicable Rule 4403 requirements. [District Rule 4403]
32. VOC content of gas processed shall not exceed 50% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of two years. [District Rules 2201 and 1070]
33. VOC content of gas shall be measured using ASTM D1945-96, EPA Method 25 or EPA Method 18 referenced as methane. [District Rule 2201]
34. All records required by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District Rules 1070 and 2201]
35. Prior to operating equipment under this Authority to Construct, permittee shall surrender (pollutant) emission reduction credits for the following quantities of VOC emissions: 1st quarter - 806 lb, 2nd quarter - 806 lb, 3rd quarter - 806 lb, and fourth quarter - 806 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 12/19/02). [District Rule 2201]
36. Prior to operating equipment under this Authority to Construct, permittee shall surrender (pollutant) emission reduction credits for the following quantities of NOx emissions: 1st quarter - 452 lb, 2nd quarter - 452 lb, 3rd quarter - 452, and fourth quarter - 452 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 12/19/02). [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

37. Prior to operating equipment under this Authority to Construct, permittee shall surrender (pollutant) emission reduction credits for the following quantities of PM10 emissions: 1st quarter - 119 lb, 2nd quarter - 119 lb, 3rd quarter - 119 lb, and fourth quarter - 119 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 12/19/02). NOx emission reductions may be used to offset PM10 emission increases at an interpollutant ratio of 2.22:1. [District Rule 2201]

38. Prior to operating equipment under this Authority to Construct, permittee shall surrender (pollutant) emission reduction credits for the following quantities of CO emissions: 1st quarter - 3,093 lb, 2nd quarter - 3,093 lb, 3rd quarter - 3,093 lb, and fourth quarter - 3,093 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 12/19/02). [District Rule 2201]

39. Prior to operating equipment under this Authority to Construct, permittee shall surrender (pollutant) emission reduction credits for the following quantities of SOx emissions: 1st quarter - 65 lb, 2nd quarter - 65 lb, 3rd quarter - 65 lb, and fourth quarter - 65 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 12/19/02). [District Rule 2201]

40. ERC Certificate Numbers S-1170-1, S-2029-5, S-825-3, and S-1617-2 shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-2234-127-0 **EXPIRATION DATE:** 10/31/2009

SECTION: 26 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-25) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The permittee shall install and operate a nonresettable fuel meter and a nonresettable elapsed operating time meter. The owner or operator shall maintain these required meters in proper operating condition. The fuel meter shall be calibrated periodically per the recommendations of the manufacturer. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
4. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
6. VOC emissions from fugitive components associated with this engine/compressor shall not exceed 0.46 lb VOC per day. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Emissions from IC engine shall not exceed any of the following: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The fuel consumption limit for this engine shall not exceed 241.6 Mscf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Source tests to show compliance with CO, NOx, and VOC emission limits shall be conducted within 60 days of startup and at least once every 12 months thereafter, by District-witnessed sample collection by independent testing laboratory. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081, 7.2] Federally Enforceable Through Title V Permit
11. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081, 5.0] Federally Enforceable Through Title V Permit
12. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

13. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25 or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rules 1081, 4701, 6.4 and 4702, 6.4] Federally Enforceable Through Title V Permit

14. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4701, 5.4.3 and 4702, 5.6.9] Federally Enforceable Through Title V Permit

15. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

16. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4701, 6.2.1 and 4702, 6.2.1] Federally Enforceable Through Title V Permit

17. The permittee shall maintain monthly records of the following information: hours of operation, type, quantity and sulfur content of fuel used, maintenance and/or modifications performed, emissions monitoring data and compliance source test results. [District Rules 2201, 4701, 6.2.1and 4702, 6.2.1] Federally Enforceable Through Title V Permit

18. The portable analyzer shall be calibrated in accordance with manufacturer guidelines and District policy SSP-1810. [District Rules 4701, 5.4.3 and 4702, 5.6.9] Federally Enforceable Through Title V Permit

19. The results of the measurements taken with the District approved analyzer shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit

20. If the IC engine is fired on PUC-regulated natural gas, then maintain on file copies of all natural gas bills. [District Rule 2201] Federally Enforceable Through Title V Permit

21. If the engine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201] Federally Enforceable Through Title V Permit

22. If the engine is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit

23. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (Amended December 16, 1993), of 3 thirty minute test runs for NOx and CO. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

24. Components to be screened shall be identified and categorized according to the following equipment types: connectors, flanges, open-ended lines (sample connections, drains, bleed valves, etc.) pump seals, valves with visible actuators and other (pressure relief devices, compressor seals, meters, etc.). Components shall be further identified and categorized according to the following types of service: gas/light liquid and heavy liquid service. [District Rule 2201] Federally Enforceable Through Title V Permit

25. Components shall be inspected for leaks at least quarterly using a portable hydrocarbon detection instrument. Any vapor leak greater than 7,500 ppmv, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21, or condensate leaking at a rate of greater than 3 drops of liquid per minute shall be repaired in a manner consistent with the procedures specified in Rule 4403 Section 5.1.4, 5.1.5, and 5.1.6. [District Rule 2010 and 4403] Federally Enforceable Through Title V Permit

26. Fugitive VOC emission rate was calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c less than or equal to 10,000 ppm (Feb 1999). [District Rule 2201] Federally Enforceable Through Title V Permit

27. Permittee shall comply in full with all applicable Rule 4403 requirements. [District Rule 4403] Federally Enforceable Through Title V Permit

28. VOC content of gas processed shall not exceed 50% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of five years. [District Rules 2201 and 1070] Federally Enforceable Through Title V Permit

29. VOC content of gas shall be measured using ASTM D1945-96, EPA Method 25 or EPA Method 18 referenced as methane. [District Rule 2201] Federally Enforceable Through Title V Permit

30. All records required by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-2234-128-0 **EXPIRATION DATE:** 10/31/2009

SECTION: 28 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-26) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The permittee shall install and operate a nonresettable fuel meter and a nonresettable elapsed operating time meter. The owner or operator shall maintain these required meters in proper operating condition. The fuel meter shall be calibrated periodically per the recommendations of the manufacturer. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
4. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
6. VOC emissions from fugitive components associated with this engine/compressor shall not exceed 0.46 lb VOC per day. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Emissions from IC engine shall not exceed any of the following: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The fuel consumption limit for this engine shall not exceed 241.6 Mscf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Source tests to show compliance with CO, NOx, and VOC emission limits shall be conducted within 60 days of startup and at least once every 12 months thereafter, by District-witnessed sample collection by independent testing laboratory. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081, 7.2] Federally Enforceable Through Title V Permit
11. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081, 5.0] Federally Enforceable Through Title V Permit
12. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

13. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25 or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rules 1081, 4701, 6.4 and 4702, 6.4] Federally Enforceable Through Title V Permit

14. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4701, 5.4.3 and 4702, 5.6.9] Federally Enforceable Through Title V Permit

15. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

16. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4701, 6.2.1 and 4702, 6.2.1] Federally Enforceable Through Title V Permit

17. The permittee shall maintain monthly records of the following information: hours of operation, type, quantity and sulfur content of fuel used, maintenance and/or modifications performed, emissions monitoring data and compliance source test results. [District Rules 2201, 4701, 6.2.1and 4702, 6.2.1] Federally Enforceable Through Title V Permit

18. The portable analyzer shall be calibrated in accordance with manufacturer guidelines and District policy SSP-1810. [District Rules 4701, 5.4.3 and 4702, 5.6.9] Federally Enforceable Through Title V Permit

19. The results of the measurements taken with the District approved analyzer shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit

20. If the IC engine is fired on PUC-regulated natural gas, then maintain on file copies of all natural gas bills. [District Rule 2201] Federally Enforceable Through Title V Permit

21. If the engine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201] Federally Enforceable Through Title V Permit

22. If the engine is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit

23. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (Amended December 16, 1993), of 3 thirty minute test runs for NOx and CO. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

24. Components to be screened shall be identified and categorized according to the following equipment types: connectors, flanges, open-ended lines (sample connections, drains, bleed valves, etc.) pump seals, valves with visible actuators and other (pressure relief devices, compressor seals, meters, etc.). Components shall be further identified and categorized according to the following types of service: gas/light liquid and heavy liquid service. [District Rule 2201] Federally Enforceable Through Title V Permit

25. Components shall be inspected for leaks at least quarterly using a portable hydrocarbon detection instrument. Any vapor leak greater than 7,500 ppmv, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21, or condensate leaking at a rate of greater than 3 drops of liquid per minute shall be repaired in a manner consistent with the procedures specified in Rule 4403 Section 5.1.4, 5.1.5, and 5.1.6. [District Rule 2010 and 4403] Federally Enforceable Through Title V Permit

26. Fugitive VOC emission rate was calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c less than or equal to 10,000 ppm (Feb 1999). [District Rule 2201] Federally Enforceable Through Title V Permit

27. Permittee shall comply in full with all applicable Rule 4403 requirements. [District Rule 4403] Federally Enforceable Through Title V Permit

28. VOC content of gas processed shall not exceed 50% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of five years. [District Rules 2201 and 1070] Federally Enforceable Through Title V Permit

29. VOC content of gas shall be measured using ASTM D1945-96, EPA Method 25 or EPA Method 18 referenced as methane. [District Rule 2201] Federally Enforceable Through Title V Permit

30. All records required by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-2234-129-1 **EXPIRATION DATE:** 10/31/2009

SECTION: 29 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-27) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Emissions from this IC engine shall not exceed any of the following limits: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District NSR Rule and District Rule 4702, 5.1] Federally Enforceable Through Title V Permit
5. VOC emissions from fugitive components associated with this engine/compressor shall not exceed 0.46 lb VOC per day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Fugitive VOC emission rate was calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c less than or equal to 10,000 ppm (Feb 1999). [District NSR Rule] Federally Enforceable Through Title V Permit
7. The fuel consumption limit for this engine shall not exceed 241.6 Mscf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District NSR Rule] Federally Enforceable Through Title V Permit
9. If the IC engine is fired on PUC-regulated natural gas, the permittee shall maintain on file, copies of all natural gas bills. [District NSR Rule] Federally Enforceable Through Title V Permit
10. If the engine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District NSR Rule] Federally Enforceable Through Title V Permit
11. If the engine is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

12. The permittee shall install and operate a nonresettable elapsed operating time meter. The elapsed operating time meter shall be properly maintained in accordance with the manufacturer's specifications. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit

13. Source testing to measure the natural gas-combustion NOx, CO, and VOC emissions from this unit shall be conducted not less than once every twelve (12) months. [District NSR Rule and District Rule 4702, 6.3.2] Federally Enforceable Through Title V Permit

14. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit

15. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

16. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25A or 25B or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rules 1081 and 4702, 6.4] Federally Enforceable Through Title V Permit

17. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. NOx, CO and VOC concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit

18. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080] Federally Enforceable Through Title V Permit

19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit

20. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702, 6.5] Federally Enforceable Through Title V Permit

21. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.9] Federally Enforceable Through Title V Permit

22. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

23. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rule 4702, 5.6.1] Federally Enforceable Through Title V Permit

24. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

25. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit

26. The results of the measurements taken with the District approved analyzer shall be maintained on the premises at all times. [District NSR Rule] Federally Enforceable Through Title V Permit

27. Components to be screened shall be identified and categorized according to the following equipment types: connectors, flanges, open-ended lines (sample connections, drains, bleed valves, etc.) pump seals, valves with visible actuators and other (pressure relief devices, compressor seals, meters, etc.). Components shall be further identified and categorized according to the following types of service: gas/light liquid and heavy liquid service. [District NSR Rule] Federally Enforceable Through Title V Permit

28. Components shall be inspected for leaks at least quarterly using a portable hydrocarbon detection instrument. Any vapor leak greater than 7,500 ppmv, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21, or condensate leaking at a rate of greater than 3 drops of liquid per minute shall be repaired in a manner consistent with the procedures specified in Rule 4409. [District NSR Rule] Federally Enforceable Through Title V Permit

29. This operation shall comply with the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409]

30. VOC content of gas processed shall not exceed 50% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of two years. [District NSR Rule and District Rule 1070] Federally Enforceable Through Title V Permit

31. VOC content of gas shall be measured using ASTM D1945-96, EPA Method 25 or EPA Method 18 referenced as methane. [District NSR Rule] Federally Enforceable Through Title V Permit

32. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type, quantity (cubic feet of gas or gallons of liquid) and sulfur content of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District NSR Rule and District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit

33. All records required by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District NSR Rule and District Rules 1070 and 4702, 6.2.1 and 6.2.2] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-2234-130-0 **EXPIRATION DATE:** 10/31/2009

SECTION: 28 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-28) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District NSR Rule]
4. The permittee shall install and operate a nonresettable fuel meter and a nonresettable elapsed operating time meter. The owner or operator shall maintain these required meters in proper operating condition. The fuel meter shall be calibrated periodically per the recommendations of the manufacturer. [District Rule 4702]
5. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201]
6. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District NSR Rule]
7. VOC emissions from fugitive components associated with this engine/compressor shall not exceed 0.46 lb VOC per day. [District NSR Rule]
8. Emissions from IC engine shall not exceed any of the following: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District NSR Rule]
9. The fuel consumption limit for this engine shall not exceed 241.6 Mscf/day. [District Rule 2201]
10. Source tests to show compliance with CO, NOx, and VOC emission limits shall be conducted at least once every 12 months, by District-witnessed sample collection by independent testing laboratory. [District Rule 2201]
11. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080]
12. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081]
13. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080]
14. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25 or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rules 1081 and 4702]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

15. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702]

16. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rule 4702]

17. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702]

18. The permittee shall maintain monthly records of the following information: hours of operation, type, quantity and sulfur content of fuel used, maintenance and/or modifications performed, emissions monitoring data and compliance source test results. [District NSR Rule and Rule 4702]

19. The portable analyzer shall be calibrated in accordance with manufacturer guidelines and District policy SSP-1810. [District Rule 4702]

20. The results of the measurements taken with the District approved analyzer shall be maintained on the premises at all times. [District NSR Rule]

21. If the IC engine is fired on PUC-regulated natural gas, then maintain on file copies of all natural gas bills. [District NSR Rule]

22. If the engine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201]

23. If the engine is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201]

24. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (Amended December 16, 1993), of 3 thirty minute test runs for NOx and CO. [District Rule 1081]

25. Components to be screened shall be identified and categorized according to the following equipment types: connectors, flanges, open-ended lines (sample connections, drains, bleed valves, etc.) pump seals, valves with visible actuators and other (pressure relief devices, compressor seals, meters, etc.). Components shall be further identified and categorized according to the following types of service: gas/light liquid and heavy liquid service. [District Rule 2201]

26. Fugitive VOC emission rate was calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c less than or equal to 10,000 ppm (Feb 1999). [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

27. VOC content of gas processed shall not exceed 50% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of two years. [District Rules 2201 and 1070]
28. VOC content of gas shall be measured using ASTM D1945-96, EPA Method 25 or EPA Method 18 referenced as methane. [District Rule 2201]
29. All records required by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District Rules 1070 and 2201]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-2234-131-0 **EXPIRATION DATE:** 10/31/2009

SECTION: 26 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-29) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The permittee shall install and operate a nonresettable fuel meter and a nonresettable elapsed operating time meter. The owner or operator shall maintain these required meters in proper operating condition. The fuel meter shall be calibrated periodically per the recommendations of the manufacturer. [District Rule 4702] Federally Enforceable Through Title V Permit
4. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
6. VOC emissions from fugitive components associated with this engine/compressor shall not exceed 0.46 lb VOC per day. [District NSR Rule]
7. Emissions from IC engine shall not exceed any of the following: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The fuel consumption limit for this engine shall not exceed 241.6 Mscf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Source tests to show compliance with CO, NOx, and VOC emission limits shall be conducted at least once every 12 months by District-witnessed sample collection by independent testing laboratory. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080] Federally Enforceable Through Title V Permit
11. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
12. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

13. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25 or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rules 1081, 4701, and 4702] Federally Enforceable Through Title V Permit

14. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

15. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

16. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

17. The permittee shall maintain monthly records of the following information: hours of operation, type, quantity and sulfur content of fuel used, maintenance and/or modifications performed, emissions monitoring data and compliance source test results. [District NSR Rule, 4701, and 4702] Federally Enforceable Through Title V Permit

18. The portable analyzer shall be calibrated in accordance with manufacturer guidelines and District policy SSP-1810. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

19. The results of the measurements taken with the District approved analyzer shall be maintained on the premises at all times. [District NSR Rule] Federally Enforceable Through Title V Permit

20. If the IC engine is fired on PUC-regulated natural gas, then maintain on file copies of all natural gas bills. [District NSR Rule] Federally Enforceable Through Title V Permit

21. If the engine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District NSR Rule] Federally Enforceable Through Title V Permit

22. If the engine is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District NSR Rule] Federally Enforceable Through Title V Permit

23. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (Amended December 16, 1993), of 3 thirty-minute test runs for NOx and CO. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

24. Components to be screened shall be identified and categorized according to the following equipment types: connectors, flanges, open-ended lines (sample connections, drains, bleed valves, etc.) pump seals, valves with visible actuators and other (pressure relief devices, compressor seals, meters, etc.). Components shall be further identified and categorized according to the following types of service: gas/light liquid and heavy liquid service. [District NSR Rule] Federally Enforceable Through Title V Permit

25. Components shall be inspected for leaks at least quarterly using a portable hydrocarbon detection instrument. Any vapor leak greater than 7,500 ppmv, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21, or condensate leaking at a rate of greater than 3 drops of liquid per minute shall be repaired in a manner consistent with the procedures specified in Rule 4403 Section 5.1.4, 5.1.5, and 5.1.6. [District Rule 2010 and 4403] Federally Enforceable Through Title V Permit

26. Fugitive VOC emission rate was calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c less than or equal to 10,000 ppm (Feb 1999). [District NSR Rule] Federally Enforceable Through Title V Permit

27. Permittee shall comply in full with all applicable Rule 4403 requirements. [District Rule 4403] Federally Enforceable Through Title V Permit

28. VOC content of gas processed shall not exceed 50% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of five years. [District NSR Rule and 1070] Federally Enforceable Through Title V Permit

29. VOC content of gas shall be measured using ASTM D1945, EPA Method 25 or EPA Method 18 referenced as methane. [District NSR Rule] Federally Enforceable Through Title V Permit

30. All records required by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District NSR Rule and 1070] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-2234-132-0 **EXPIRATION DATE:** 10/31/2009

SECTION: 26 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-30) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The permittee shall install and operate a nonresettable fuel meter and a nonresettable elapsed operating time meter. The owner or operator shall maintain these required meters in proper operating condition. The fuel meter shall be calibrated periodically per the recommendations of the manufacturer. [District Rule 4702] Federally Enforceable Through Title V Permit
4. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
6. VOC emissions from fugitive components associated with this engine/compressor shall not exceed 0.46 lb VOC per day. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Emissions from IC engine shall not exceed any of the following: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The fuel consumption limit for this engine shall not exceed 241.6 Mscf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Source tests to show compliance with CO, NOx, and VOC emission limits shall be conducted at least once every 12 months by District-witnessed sample collection by independent testing laboratory. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080] Federally Enforceable Through Title V Permit
11. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
12. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

13. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25 or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rules 1081, 4701, and 4702] Federally Enforceable Through Title V Permit

14. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

15. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

16. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

17. The permittee shall maintain monthly records of the following information: hours of operation, type, quantity and sulfur content of fuel used, maintenance and/or modifications performed, emissions monitoring data and compliance source test results. [District NSR Rule, 4701, and 4702] Federally Enforceable Through Title V Permit

18. The portable analyzer shall be calibrated in accordance with manufacturer guidelines and District policy SSP-1810. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

19. The results of the measurements taken with the District approved analyzer shall be maintained on the premises at all times. [District NSR Rule] Federally Enforceable Through Title V Permit

20. If the IC engine is fired on PUC-regulated natural gas, then maintain on file copies of all natural gas bills. [District NSR Rule] Federally Enforceable Through Title V Permit

21. If the engine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District NSR Rule] Federally Enforceable Through Title V Permit

22. If the engine is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District NSR Rule] Federally Enforceable Through Title V Permit

23. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (Amended December 16, 1993), of 3 thirty-minute test runs for NOx and CO. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

24. Components to be screened shall be identified and categorized according to the following equipment types: connectors, flanges, open-ended lines (sample connections, drains, bleed valves, etc.) pump seals, valves with visible actuators and other (pressure relief devices, compressor seals, meters, etc.). Components shall be further identified and categorized according to the following types of service: gas/light liquid and heavy liquid service. [District NSR Rule] Federally Enforceable Through Title V Permit

25. Components shall be inspected for leaks at least quarterly using a portable hydrocarbon detection instrument. Any vapor leak greater than 7,500 ppmv, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21, or condensate leaking at a rate of greater than 3 drops of liquid per minute shall be repaired in a manner consistent with the procedures specified in Rule 4403 Section 5.1.4, 5.1.5, and 5.1.6. [District Rule 2010 and 4403] Federally Enforceable Through Title V Permit

26. Fugitive VOC emission rate was calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c less than or equal to 10,000 ppm (Feb 1999). [District NSR Rule] Federally Enforceable Through Title V Permit

27. Permittee shall comply in full with all applicable Rule 4403 requirements. [District Rule 4403] Federally Enforceable Through Title V Permit

28. VOC content of gas processed shall not exceed 50% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of five years. [District NSR Rule and 1070] Federally Enforceable Through Title V Permit

29. VOC content of gas shall be measured using ASTM D1945, EPA Method 25 or EPA Method 18 referenced as methane. [District NSR Rule] Federally Enforceable Through Title V Permit

30. All records required by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District NSR Rule and 1070] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-2234-133-0 **EXPIRATION DATE:** 10/31/2009

SECTION: 26 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-31) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The permittee shall install and operate a nonresettable fuel meter and a nonresettable elapsed operating time meter. The owner or operator shall maintain these required meters in proper operating condition. The fuel meter shall be calibrated periodically per the recommendations of the manufacturer. [District Rule 4702] Federally Enforceable Through Title V Permit
4. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
6. VOC emissions from fugitive components associated with this engine/compressor shall not exceed 0.46 lb VOC per day. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Emissions from IC engine shall not exceed any of the following: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The fuel consumption limit for this engine shall not exceed 241.6 Mscf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Source tests to show compliance with CO, NOx, and VOC emission limits shall be conducted at least once every 12 months by District-witnessed sample collection by independent testing laboratory. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080] Federally Enforceable Through Title V Permit
11. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
12. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

13. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25 or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rules 1081, 4701, and 4702] Federally Enforceable Through Title V Permit

14. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

15. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

16. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

17. The permittee shall maintain monthly records of the following information: hours of operation, type, quantity and sulfur content of fuel used, maintenance and/or modifications performed, emissions monitoring data and compliance source test results. [District NSR Rule, 4701, and 4702] Federally Enforceable Through Title V Permit

18. The portable analyzer shall be calibrated in accordance with manufacturer guidelines and District policy SSP-1810. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

19. The results of the measurements taken with the District approved analyzer shall be maintained on the premises at all times. [District NSR Rule] Federally Enforceable Through Title V Permit

20. If the IC engine is fired on PUC-regulated natural gas, then maintain on file copies of all natural gas bills. [District NSR Rule] Federally Enforceable Through Title V Permit

21. If the engine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District NSR Rule] Federally Enforceable Through Title V Permit

22. If the engine is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District NSR Rule] Federally Enforceable Through Title V Permit

23. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (Amended December 16, 1993), of 3 thirty-minute test runs for NOx and CO. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

24. Components to be screened shall be identified and categorized according to the following equipment types: connectors, flanges, open-ended lines (sample connections, drains, bleed valves, etc.) pump seals, valves with visible actuators and other (pressure relief devices, compressor seals, meters, etc.). Components shall be further identified and categorized according to the following types of service: gas/light liquid and heavy liquid service. [District NSR Rule] Federally Enforceable Through Title V Permit

25. Components shall be inspected for leaks at least quarterly using a portable hydrocarbon detection instrument. Any vapor leak greater than 7,500 ppmv, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21, or condensate leaking at a rate of greater than 3 drops of liquid per minute shall be repaired in a manner consistent with the procedures specified in Rule 4403 Section 5.1.4, 5.1.5, and 5.1.6. [District Rule 2010 and 4403] Federally Enforceable Through Title V Permit

26. Fugitive VOC emission rate was calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c less than or equal to 10,000 ppm (Feb 1999). [District NSR Rule] Federally Enforceable Through Title V Permit

27. Permittee shall comply in full with all applicable Rule 4403 requirements. [District Rule 4403] Federally Enforceable Through Title V Permit

28. VOC content of gas processed shall not exceed 50% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of five years. [District NSR Rule and 1070] Federally Enforceable Through Title V Permit

29. VOC content of gas shall be measured using ASTM D1945, EPA Method 25 or EPA Method 18 referenced as methane. [District NSR Rule] Federally Enforceable Through Title V Permit

30. All records required by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District NSR Rule and 1070] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-2234-134-0 **EXPIRATION DATE:** 10/31/2009

SECTION: 36 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-32) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The permittee shall install and operate a nonresettable fuel meter and a nonresettable elapsed operating time meter. The owner or operator shall maintain these required meters in proper operating condition. The fuel meter shall be calibrated periodically per the recommendations of the manufacturer. [District Rule 4702] Federally Enforceable Through Title V Permit
4. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
6. VOC emissions from fugitive components associated with this engine/compressor shall not exceed 0.46 lb VOC per day. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Emissions from IC engine shall not exceed any of the following: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The fuel consumption limit for this engine shall not exceed 241.6 Mscf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Source tests to show compliance with CO, NOx, and VOC emission limits shall be conducted at least once every 12 months by District-witnessed sample collection by independent testing laboratory. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080] Federally Enforceable Through Title V Permit
11. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
12. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

13. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25 or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rules 1081, 4701, and 4702] Federally Enforceable Through Title V Permit

14. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

15. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

16. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

17. The permittee shall maintain monthly records of the following information: hours of operation, type, quantity and sulfur content of fuel used, maintenance and/or modifications performed, emissions monitoring data and compliance source test results. [District NSR Rule, 4701, and 4702] Federally Enforceable Through Title V Permit

18. The portable analyzer shall be calibrated in accordance with manufacturer guidelines and District policy SSP-1810. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

19. The results of the measurements taken with the District approved analyzer shall be maintained on the premises at all times. [District NSR Rule] Federally Enforceable Through Title V Permit

20. If the IC engine is fired on PUC-regulated natural gas, then maintain on file copies of all natural gas bills. [District NSR Rule] Federally Enforceable Through Title V Permit

21. If the engine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District NSR Rule] Federally Enforceable Through Title V Permit

22. If the engine is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District NSR Rule] Federally Enforceable Through Title V Permit

23. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (Amended December 16, 1993), of 3 thirty-minute test runs for NOx and CO. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

24. Components to be screened shall be identified and categorized according to the following equipment types: connectors, flanges, open-ended lines (sample connections, drains, bleed valves, etc.) pump seals, valves with visible actuators and other (pressure relief devices, compressor seals, meters, etc.). Components shall be further identified and categorized according to the following types of service: gas/light liquid and heavy liquid service. [District NSR Rule] Federally Enforceable Through Title V Permit

25. Components shall be inspected for leaks at least quarterly using a portable hydrocarbon detection instrument. Any vapor leak greater than 7,500 ppmv, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21, or condensate leaking at a rate of greater than 3 drops of liquid per minute shall be repaired in a manner consistent with the procedures specified in Rule 4403 Section 5.1.4, 5.1.5, and 5.1.6. [District Rule 2010 and 4403] Federally Enforceable Through Title V Permit

26. Fugitive VOC emission rate was calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c less than or equal to 10,000 ppm (Feb 1999). [District NSR Rule] Federally Enforceable Through Title V Permit

27. Permittee shall comply in full with all applicable Rule 4403 requirements. [District Rule 4403] Federally Enforceable Through Title V Permit

28. VOC content of gas processed shall not exceed 50% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of five years. [District NSR Rule and 1070] Federally Enforceable Through Title V Permit

29. VOC content of gas shall be measured using ASTM D1945, EPA Method 25 or EPA Method 18 referenced as methane. [District NSR Rule] Federally Enforceable Through Title V Permit

30. All records required by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District NSR Rule and 1070] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-2234-135-0 **EXPIRATION DATE:** 10/31/2009

SECTION: 29 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-33) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The permittee shall install and operate a nonresettable fuel meter and a nonresettable elapsed operating time meter. The owner or operator shall maintain these required meters in proper operating condition. The fuel meter shall be calibrated periodically per the recommendations of the manufacturer. [District Rule 4702] Federally Enforceable Through Title V Permit
4. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
6. VOC emissions from fugitive components associated with this engine/compressor shall not exceed 0.46 lb VOC per day. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Emissions from IC engine shall not exceed any of the following: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The fuel consumption limit for this engine shall not exceed 241.6 Mscf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Source tests to show compliance with CO, NOx, and VOC emission limits shall be conducted at least once every 12 months by District-witnessed sample collection by independent testing laboratory. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080] Federally Enforceable Through Title V Permit
11. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
12. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

13. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25 or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rules 1081, 4701, and 4702] Federally Enforceable Through Title V Permit

14. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

15. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

16. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

17. The permittee shall maintain monthly records of the following information: hours of operation, type, quantity and sulfur content of fuel used, maintenance and/or modifications performed, emissions monitoring data and compliance source test results. [District NSR Rule, 4701, and 4702] Federally Enforceable Through Title V Permit

18. The portable analyzer shall be calibrated in accordance with manufacturer guidelines and District policy SSP-1810. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

19. The results of the measurements taken with the District approved analyzer shall be maintained on the premises at all times. [District NSR Rule] Federally Enforceable Through Title V Permit

20. If the IC engine is fired on PUC-regulated natural gas, then maintain on file copies of all natural gas bills. [District NSR Rule] Federally Enforceable Through Title V Permit

21. If the engine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District NSR Rule] Federally Enforceable Through Title V Permit

22. If the engine is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District NSR Rule] Federally Enforceable Through Title V Permit

23. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (Amended December 16, 1993), of 3 thirty-minute test runs for NOx and CO. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

24. Components to be screened shall be identified and categorized according to the following equipment types: connectors, flanges, open-ended lines (sample connections, drains, bleed valves, etc.) pump seals, valves with visible actuators and other (pressure relief devices, compressor seals, meters, etc.). Components shall be further identified and categorized according to the following types of service: gas/light liquid and heavy liquid service. [District NSR Rule] Federally Enforceable Through Title V Permit

25. Components shall be inspected for leaks at least quarterly using a portable hydrocarbon detection instrument. Any vapor leak greater than 7,500 ppmv, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21, or condensate leaking at a rate of greater than 3 drops of liquid per minute shall be repaired in a manner consistent with the procedures specified in Rule 4403 Section 5.1.4, 5.1.5, and 5.1.6. [District Rule 2010 and 4403] Federally Enforceable Through Title V Permit

26. Fugitive VOC emission rate was calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c less than or equal to 10,000 ppm (Feb 1999). [District NSR Rule] Federally Enforceable Through Title V Permit

27. Permittee shall comply in full with all applicable Rule 4403 requirements. [District Rule 4403] Federally Enforceable Through Title V Permit

28. VOC content of gas processed shall not exceed 50% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of five years. [District NSR Rule and 1070] Federally Enforceable Through Title V Permit

29. VOC content of gas shall be measured using ASTM D1945, EPA Method 25 or EPA Method 18 referenced as methane. [District NSR Rule] Federally Enforceable Through Title V Permit

30. All records required by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District NSR Rule and 1070] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-2234-136-0 **EXPIRATION DATE:** 10/31/2009

SECTION: 29 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-34) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The permittee shall install and operate a nonresettable fuel meter and a nonresettable elapsed operating time meter. The owner or operator shall maintain these required meters in proper operating condition. The fuel meter shall be calibrated periodically per the recommendations of the manufacturer. [District Rule 4702] Federally Enforceable Through Title V Permit
4. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
6. VOC emissions from fugitive components associated with this engine/compressor shall not exceed 0.46 lb VOC per day. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Emissions from IC engine shall not exceed any of the following: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The fuel consumption limit for this engine shall not exceed 241.6 Mscf/day. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Source tests to show compliance with CO, NOx, and VOC emission limits shall be conducted at least once every 12 months by District-witnessed sample collection by independent testing laboratory. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080] Federally Enforceable Through Title V Permit
11. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
12. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

13. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25 or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rules 1081, 4701, and 4702] Federally Enforceable Through Title V Permit

14. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

15. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

16. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

17. The permittee shall maintain monthly records of the following information: hours of operation, type, quantity and sulfur content of fuel used, maintenance and/or modifications performed, emissions monitoring data and compliance source test results. [District NSR Rule, 4701, and 4702] Federally Enforceable Through Title V Permit

18. The portable analyzer shall be calibrated in accordance with manufacturer guidelines and District policy SSP-1810. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

19. The results of the measurements taken with the District approved analyzer shall be maintained on the premises at all times. [District NSR Rule] Federally Enforceable Through Title V Permit

20. If the IC engine is fired on PUC-regulated natural gas, then maintain on file copies of all natural gas bills. [District NSR Rule] Federally Enforceable Through Title V Permit

21. If the engine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District NSR Rule] Federally Enforceable Through Title V Permit

22. If the engine is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District NSR Rule] Federally Enforceable Through Title V Permit

23. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (Amended December 16, 1993), of 3 thirty-minute test runs for NOx and CO. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

24. Components to be screened shall be identified and categorized according to the following equipment types: connectors, flanges, open-ended lines (sample connections, drains, bleed valves, etc.) pump seals, valves with visible actuators and other (pressure relief devices, compressor seals, meters, etc.). Components shall be further identified and categorized according to the following types of service: gas/light liquid and heavy liquid service. [District NSR Rule] Federally Enforceable Through Title V Permit

25. Components shall be inspected for leaks at least quarterly using a portable hydrocarbon detection instrument. Any vapor leak greater than 7,500 ppmv, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21, or condensate leaking at a rate of greater than 3 drops of liquid per minute shall be repaired in a manner consistent with the procedures specified in Rule 4403 Section 5.1.4, 5.1.5, and 5.1.6. [District Rule 2010 and 4403] Federally Enforceable Through Title V Permit

26. Fugitive VOC emission rate was calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c less than or equal to 10,000 ppm (Feb 1999). [District NSR Rule] Federally Enforceable Through Title V Permit

27. Permittee shall comply in full with all applicable Rule 4403 requirements. [District Rule 4403] Federally Enforceable Through Title V Permit

28. VOC content of gas processed shall not exceed 50% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of five years. [District NSR Rule and 1070] Federally Enforceable Through Title V Permit

29. VOC content of gas shall be measured using ASTM D1945, EPA Method 25 or EPA Method 18 referenced as methane. [District NSR Rule] Federally Enforceable Through Title V Permit

30. All records required by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District NSR Rule and 1070] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-2234-137-0 **EXPIRATION DATE:** 10/31/2009

SECTION: 27 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-35) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District NSR Rule]
4. The permittee shall install and operate a nonresettable fuel meter and a nonresettable elapsed operating time meter. The owner or operator shall maintain these required meters in proper operating condition. The fuel meter shall be calibrated periodically per the recommendations of the manufacturer. [District Rule 4702]
5. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201]
6. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District NSR Rule]
7. VOC emissions from fugitive components associated with this engine/compressor shall not exceed 0.46 lb VOC per day. [District NSR Rule]
8. Emissions from IC engine shall not exceed any of the following: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District NSR Rule]
9. The fuel consumption limit for this engine shall not exceed 241.6 Mscf/day. [District Rule 2201]
10. Source tests to show compliance with CO, NOx, and VOC emission limits shall be conducted at least once every 12 months, by District-witnessed sample collection by independent testing laboratory. [District Rule 2201]
11. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080]
12. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081]
13. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080]
14. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25 or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rules 1081 and 4702]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

15. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702]
16. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rule 4702]
17. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702]
18. The permittee shall maintain monthly records of the following information: hours of operation, type, quantity and sulfur content of fuel used, maintenance and/or modifications performed, emissions monitoring data and compliance source test results. [District Rules 2201 and 4702]
19. The portable analyzer shall be calibrated in accordance with manufacturer guidelines and District policy SSP-1810. [District Rule 4702]
20. The results of the measurements taken with the District approved analyzer shall be maintained on the premises at all times. [District Rule 2201]
21. If the IC engine is fired on PUC-regulated natural gas, then maintain on file copies of all natural gas bills. [District Rule 2201]
22. If the engine is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201]
23. If the engine is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201]
24. Emissions for this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (Amended December 16, 1993), of 3 thirty minute test runs for NOx and CO. [District Rule 1081]
25. Components to be screened shall be identified and categorized according to the following equipment types: connectors, flanges, open-ended lines (sample connections, drains, bleed valves, etc.) pump seals, valves with visible actuators and other (pressure relief devices, compressor seals, meters, etc.). Components shall be further identified and categorized according to the following types of service: gas/light liquid and heavy liquid service. [District Rule 2201]
26. Fugitive VOC emission rate was calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c less than or equal to 10,000 ppm (Feb 1999). [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

27. VOC content of gas processed shall not exceed 50% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of two years. [District Rules 2201 and 1070]
28. VOC content of gas shall be measured using ASTM D1945-96, EPA Method 25 or EPA Method 18 referenced as methane. [District Rule 2201]
29. All records required by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District Rules 1070 and 2201]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-139-1 **ISSUANCE DATE:** 03/29/2005

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (R-23) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION WITH OTHER EQUIPMENT

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. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
3. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
4. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
5. Compressor skid shall only be used in conjunction with gas processing operations. Compressor skid shall not be used in conjunction with oil and gas production operations including but not limited to the following: thermally enhanced oil recovery (TEOR) operations, well vent vapor control systems, tank vapor control systems, air enhanced crude oil production operations, or nitrogen enhanced crude oil production operations. [District Rule 2201]

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-2234-139-1 : Dec 15 2009 4:15PM – ROEDERS : Joint Inspection NOT Required

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6. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]
7. Fugitive VOC emissions from compressor skid shall be less than 0.46 lb/ day. [District Rule 2201]
8. VOC content of the gas stream processed shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
9. VOC content of the gas stream processed shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
10. VOC content of gas shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
11. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
12. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201 and 4403]
13. All piping, connectors, valves, seals, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201 and 4403]
14. 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 shall be reported as a deviation. [District Rule 2201 and 4403]
15. All piping, connectors, valves, seals, and fittings 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 provisions of this permit. If any of the components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201and 4403]
16. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2201 and 4403]
17. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
18. Authority to Construct (ATC) S-2234-139-0 shall be implemented prior to implementation of this ATC. [District Rule 2201]

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-140-1 **ISSUANCE DATE:** 03/29/2005

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (R-24) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION WITH OTHER EQUIPMENT

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. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
3. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
4. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
5. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]
6. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]

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-2234-140-1 : Dec 15 2009 4:16PM – ROEDERS : Joint Inspection NOT Required

7. Fugitive VOC emissions from compressor skid shall be less than 0.46 lb/ day. [District Rule 2201]
8. VOC content of the gas stream processed shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
9. VOC content of the gas stream processed shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
10. VOC content of gas shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
11. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
12. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201 and 4403]
13. All piping, connectors, valves, seals, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201 and 4403]
14. 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 shall be reported as a deviation. [District Rule 2201 and 4403]
15. All piping, connectors, valves, seals, and fittings 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 provisions of this permit. If any of the components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201and 4403]
16. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2201 and 4403]
17. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
18. This Authority to Construct shall be implemented concurrently with Authority to Construct S-2234-140-0. [District Rule 2201]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-141-1 **ISSUANCE DATE:** 03/29/2005

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-95) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION WITH OTHER EQUIPMENT

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. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
3. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
4. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
5. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]
6. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]

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-2234-141-1 : Dec 15 2009 4:16PM -- ROEDERS : Joint Inspection NOT Required

7. Fugitive VOC emissions from compressor skid shall be less than 0.46 lb/ day. [District Rule 2201]
8. VOC content of the gas stream processed shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
9. VOC content of the gas stream processed shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
10. VOC content of gas shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
11. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
12. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201 and 4403]
13. All piping, connectors, valves, seals, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201 and 4403]
14. 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 shall be reported as a deviation. [District Rule 2201 and 4403]
15. All piping, connectors, valves, seals, and fittings 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 provisions of this permit. If any of the components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201and 4403]
16. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2201 and 4403]
17. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
18. This Authority to Construct shall be implemented concurrently with Authority to Construct S-2234-141-0. [District Rule 2201]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-142-1 **ISSUANCE DATE:** 03/29/2005

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-103) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION WITH OTHER EQUIPMENT

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. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
3. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
4. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
5. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]
6. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]

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-2234-142-1 : Dec 15 2009 4:10PM – ROEDERS : Joint Inspection NOT Required

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7. Fugitive VOC emissions from compressor skid shall be less than 0.35 lb/ day. [District Rule 2201]
8. VOC content of the gas stream processed shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
9. VOC content of the gas stream processed shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
10. VOC content of gas shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
11. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
12. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201 and 4403]
13. All piping, connectors, valves, seals, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201 and 4403]
14. 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 shall be reported as a deviation. [District Rule 2201 and 4403]
15. All piping, connectors, valves, seals, and fittings 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 provisions of this permit. If any of the components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201and 4403]
16. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2201 and 4403]
17. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
18. This Authority to Construct shall be implemented concurrently with Authority to Construct S-2234-142-0. [District Rule 2201]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-143-1 **ISSUANCE DATE:** 03/29/2005

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-104) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION WITH OTHER EQUIPMENT

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. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
3. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
4. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
5. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]
6. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services
S-2234-143-1 : Dec 15 2009 4:16PM – ROEDERS : Joint Inspection NOT Required

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7. Fugitive VOC emissions from compressor skid shall be less than 0.35 lb/ day. [District Rule 2201]
8. VOC content of the gas stream processed shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
9. VOC content of the gas stream processed shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
10. VOC content of gas shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
11. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
12. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201 and 4403]
13. All piping, connectors, valves, seals, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201 and 4403]
14. 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 shall be reported as a deviation. [District Rule 2201 and 4403]
15. All piping, connectors, valves, seals, and fittings 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 provisions of this permit. If any of the components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201and 4403]
16. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2201 and 4403]
17. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
18. This Authority to Construct shall be implemented concurrently with Authority to Construct S-2234-143-0. [District Rule 2201]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-144-1 **ISSUANCE DATE:** 03/29/2005

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-105) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION WITH OTHER EQUIPMENT

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. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
3. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
4. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
5. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]
6. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services
S-2234-144-1 · Dec 15 2009 4:16PM – ROEDERS : Joint Inspection NOT Required

7. Fugitive VOC emissions from compressor skid shall be less than 0.35 lb/ day. [District Rule 2201]
8. VOC content of the gas stream processed shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
9. VOC content of the gas stream processed shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
10. VOC content of gas shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
11. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
12. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201 and 4403]
13. All piping, connectors, valves, seals, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201 and 4403]
14. 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 shall be reported as a deviation. [District Rule 2201 and 4403]
15. All piping, connectors, valves, seals, and fittings 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 provisions of this permit. If any of the components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201and 4403]
16. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2201 and 4403]
17. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
18. This Authority to Construct shall be implemented concurrently with Authority to Construct S-2234-144-0. [District Rule 2201]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-145-1 **ISSUANCE DATE:** 03/29/2005

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-106) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION WITH OTHER EQUIPMENT

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. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
3. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
4. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
5. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]
6. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services
S-2234-145-1 : Dec 15 2009 4:16PM – ROEDERS : Joint Inspection NOT Required

7. Fugitive VOC emissions from compressor skid shall be less than 0.35 lb/ day. [District Rule 2201]
8. VOC content of the gas stream processed shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
9. VOC content of the gas stream processed shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
10. VOC content of gas shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
11. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
12. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201 and 4403]
13. All piping, connectors, valves, seals, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201 and 4403]
14. 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 shall be reported as a deviation. [District Rule 2201 and 4403]
15. All piping, connectors, valves, seals, and fittings 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 provisions of this permit. If any of the components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201and 4403]
16. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2201 and 4403]
17. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
18. This Authority to Construct shall be implemented concurrently with Authority to Construct S-2234-145-0. [District Rule 2201]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-147-1 **ISSUANCE DATE:** 03/29/2005

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-108] AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION WITH OTHER EQUIPMENT

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. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
3. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
4. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
5. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]
6. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]

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-2234-147-1 : Dec 15 2009 4:16PM – ROEDERS : Joint Inspection NOT Required

7. Fugitive VOC emissions from compressor skid shall be less than 0.35 lb/ day. [District Rule 2201]
8. VOC content of the gas stream processed shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
9. VOC content of the gas stream processed shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
10. VOC content of gas shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
11. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
12. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201 and 4403]
13. All piping, connectors, valves, seals, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201 and 4403]
14. 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 shall be reported as a deviation. [District Rule 2201 and 4403]
15. All piping, connectors, valves, seals, and fittings 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 provisions of this permit. If any of the components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201and 4403]
16. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2201 and 4403]
17. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
18. This Authority to Construct shall be implemented concurrently with Authority to Construct S-2234-147-0. [District Rule 2201]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-150-1 **ISSUANCE DATE:** 03/29/2005

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-109) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION WITH OTHER EQUIPMENT

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. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
3. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
4. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
5. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]
6. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]

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-2234-150-1 : Dec 15 2009 4:16PM – ROEDERS : Joint Inspection NOT Required

7. Fugitive VOC emissions from compressor skid shall be less than 0.46 lb/ day. [District Rule 2201]
8. VOC content of the gas stream processed shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
9. VOC content of the gas stream processed shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
10. VOC content of gas shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
11. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
12. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201 and 4403]
13. All piping, connectors, valves, seals, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201 and 4403]
14. 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 shall be reported as a deviation. [District Rule 2201 and 4403]
15. All piping, connectors, valves, seals, and fittings 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 provisions of this permit. If any of the components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201and 4403]
16. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2201 and 4403]
17. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
18. This Authority to Construct shall be implemented concurrently with Authority to Construct S-2234-150-0. [District Rule 2201]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-151-1 **ISSUANCE DATE:** 03/29/2005

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-110) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION WITH OTHER EQUIPMENT

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. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
3. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
4. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
5. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]
6. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]

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-2234-151-1 : Dec 15 2009 4:16PM – ROEDERS : Joint Inspection NOT Required

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7. Fugitive VOC emissions from compressor skid shall be less than 0.46 lb/ day. [District Rule 2201]
8. VOC content of the gas stream processed shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
9. VOC content of the gas stream processed shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
10. VOC content of gas shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
11. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
12. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201 and 4403]
13. All piping, connectors, valves, seals, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201 and 4403]
14. 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 shall be reported as a deviation. [District Rule 2201 and 4403]
15. All piping, connectors, valves, seals, and fittings 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 provisions of this permit. If any of the components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201and 4403]
16. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2201 and 4403]
17. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
18. This Authority to Construct shall be implemented concurrently with Authority to Construct S-2234-151-0. [District Rule 2201]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-152-1 **ISSUANCE DATE:** 03/29/2005

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-111) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION WITH OTHER EQUIPMENT

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. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
3. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
4. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
5. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]
6. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services
S-2234-152-1 Dec 15 2009 4:17PM – ROEDERS : Joint Inspection NOT Required

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7. Fugitive VOC emissions from compressor skid shall be less than 0.46 lb/ day. [District Rule 2201]
8. VOC content of the gas stream processed shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
9. VOC content of the gas stream processed shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
10. VOC content of gas shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
11. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
12. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201 and 4403]
13. All piping, connectors, valves, seals, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201 and 4403]
14. 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 shall be reported as a deviation. [District Rule 2201 and 4403]
15. All piping, connectors, valves, seals, and fittings 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 provisions of this permit. If any of the components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201and 4403]
16. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2201 and 4403]
17. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
18. This Authority to Construct shall be implemented concurrently with Authority to Construct S-2234-152-0. [District Rule 2201]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-153-1 **ISSUANCE DATE:** 03/29/2005

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-112) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION WITH OTHER EQUIPMENT

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. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
3. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
4. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
5. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]
6. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services
S-2234-153-1 : Dec 15 2009 4:17PM – ROEDERS : Joint Inspection NOT Required

7. Fugitive VOC emissions from compressor skid shall be less than 0.46 lb/ day. [District Rule 2201]
8. VOC content of the gas stream processed shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
9. VOC content of the gas stream processed shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
10. VOC content of gas shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
11. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
12. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201 and 4403]
13. All piping, connectors, valves, seals, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201 and 4403]
14. 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 shall be reported as a deviation. [District Rule 2201 and 4403]
15. All piping, connectors, valves, seals, and fittings 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 provisions of this permit. If any of the components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201and 4403]
16. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2201 and 4403]
17. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
18. This Authority to Construct shall be implemented concurrently with Authority to Construct S-2234-153-0. [District Rule 2201]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-154-1 **ISSUANCE DATE:** 03/29/2005

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-113) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: CLARIFY WHEN COMPRESSOR SKID MAY BE USED IN CONJUNCTION WITH OTHER EQUIPMENT

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. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
3. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
4. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
5. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]
6. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]

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-2234-154-1 · Dec 15 2009 4:17PM – ROEDERS : Joint Inspection NOT Required

7. Fugitive VOC emissions from compressor skid shall be less than 0.46 lb/ day. [District Rule 2201]
8. VOC content of the gas stream processed shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
9. VOC content of the gas stream processed shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
10. VOC content of gas shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
11. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
12. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201 and 4403]
13. All piping, connectors, valves, seals, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201 and 4403]
14. 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 shall be reported as a deviation. [District Rule 2201 and 4403]
15. All piping, connectors, valves, seals, and fittings 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 provisions of this permit. If any of the components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201and 4403]
16. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2201 and 4403]
17. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
18. This Authority to Construct shall be implemented concurrently with Authority to Construct S-2234-154-0. [District Rule 2201]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-157-0 **ISSUANCE DATE:** 08/08/2005

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-114) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
5. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
6. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]

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-2234-157-0 : Dec 15 2009 4:17PM – ROEDERS . Joint Inspection Required with HAMMONDS

7. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]
8. Fugitive VOC emissions from compressor skid shall be less than 0.5 lb/ day. [District Rule 2201]
9. VOC content of the total hydrocarbons in the gas stream handled shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
10. VOC content of the total hydrocarbons in the gas stream handled shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
11. VOC content shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
12. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
13. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201 and 4403]
14. All piping, connectors, valves, seals, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201 and 4403]
15. 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 shall be reported as a deviation. [District Rule 2201 and 4403]
16. All piping, connectors, valves, seals, and fittings 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 provisions of this permit. If any of the components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201and 4403]
17. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2201 and 4403]
18. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-158-0 **ISSUANCE DATE:** 08/08/2005

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-115) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
5. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
6. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]

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-2234-158-0 : Dec 15 2009 4:17PM – ROEDERS : Joint Inspection Required with HAMMONDS

7. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]
8. Fugitive VOC emissions from compressor skid shall be less than 0.5 lb/ day. [District Rule 2201]
9. VOC content of the total hydrocarbons in the gas stream handled shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
10. VOC content of the total hydrocarbons in the gas stream handled shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
11. VOC content shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
12. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
13. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201 and 4403]
14. All piping, connectors, valves, seals, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201 and 4403]
15. 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 shall be reported as a deviation. [District Rule 2201 and 4403]
16. All piping, connectors, valves, seals, and fittings 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 provisions of this permit. If any of the components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201and 4403]
17. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2201 and 4403]
18. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-159-0 **ISSUANCE DATE:** 08/08/2005

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-116) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
5. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
6. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]

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-2234-159-0 : Dec 15 2009 4:17PM – ROEDERS : Joint Inspection Required with HAMMONDS

7. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]
8. Fugitive VOC emissions from compressor skid shall be less than 0.5 lb/ day. [District Rule 2201]
9. VOC content of the total hydrocarbons in the gas stream handled shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
10. VOC content of the total hydrocarbons in the gas stream handled shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
11. VOC content shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
12. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
13. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201 and 4403]
14. All piping, connectors, valves, seals, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201 and 4403]
15. 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 shall be reported as a deviation. [District Rule 2201 and 4403]
16. All piping, connectors, valves, seals, and fittings 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 provisions of this permit. If any of the components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201and 4403]
17. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2201 and 4403]
18. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-160-0 **ISSUANCE DATE:** 08/08/2005

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-117) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
5. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
6. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services
S-2234-160-0 · Dec 15 2009 4:17PM – ROEDERS : Joint Inspection Required with HAMMONDS

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7. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]
8. Fugitive VOC emissions from compressor skid shall be less than 0.5 lb/ day. [District Rule 2201]
9. VOC content of the total hydrocarbons in the gas stream handled shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
10. VOC content of the total hydrocarbons in the gas stream handled shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
11. VOC content shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
12. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
13. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201 and 4403]
14. All piping, connectors, valves, seals, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201 and 4403]
15. 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 shall be reported as a deviation. [District Rule 2201 and 4403]
16. All piping, connectors, valves, seals, and fittings 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 provisions of this permit. If any of the components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201and 4403]
17. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2201 and 4403]
18. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-161-0 **ISSUANCE DATE:** 08/08/2005

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-118) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
5. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
6. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services
S-2234-161-0 : Dec 15 2009 4:17PM – ROEDERS : Joint Inspection Required with HAMMONDS

7. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]
8. Fugitive VOC emissions from compressor skid shall be less than 0.3 lb/ day. [District Rule 2201]
9. VOC content of the total hydrocarbons in the gas stream handled shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
10. VOC content of the total hydrocarbons in the gas stream handled shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
11. VOC content shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
12. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
13. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201 and 4403]
14. All piping, connectors, valves, seals, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201 and 4403]
15. 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 shall be reported as a deviation. [District Rule 2201 and 4403]
16. All piping, connectors, valves, seals, and fittings 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 provisions of this permit. If any of the components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201and 4403]
17. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2201 and 4403]
18. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-162-0 **ISSUANCE DATE:** 08/08/2005

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-119) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
5. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
6. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]

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-2234-162-0 : Dec 15 2009 4:17PM – ROEDERS : Joint Inspection Required with HAMMONDS

7. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]
8. Fugitive VOC emissions from compressor skid shall be less than 0.3 lb/ day. [District Rule 2201]
9. VOC content of the total hydrocarbons in the gas stream handled shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
10. VOC content of the total hydrocarbons in the gas stream handled shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
11. VOC content shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
12. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
13. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201 and 4403]
14. All piping, connectors, valves, seals, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201 and 4403]
15. 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 shall be reported as a deviation. [District Rule 2201 and 4403]
16. All piping, connectors, valves, seals, and fittings 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 provisions of this permit. If any of the components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201and 4403]
17. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2201 and 4403]
18. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-163-0 **ISSUANCE DATE:** 08/08/2005

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-120) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
5. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
6. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]

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-2234-163-0 : Dec 15 2009 4:18PM – ROEDERS : Joint Inspection Required with HAMMONDS

7. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]
8. Fugitive VOC emissions from compressor skid shall be less than 0.3 lb/ day. [District Rule 2201]
9. VOC content of the total hydrocarbons in the gas stream handled shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
10. VOC content of the total hydrocarbons in the gas stream handled shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
11. VOC content shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
12. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
13. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201 and 4403]
14. All piping, connectors, valves, seals, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201 and 4403]
15. 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 shall be reported as a deviation. [District Rule 2201 and 4403]
16. All piping, connectors, valves, seals, and fittings 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 provisions of this permit. If any of the components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201and 4403]
17. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2201 and 4403]
18. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-164-0 **ISSUANCE DATE:** 08/08/2005

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-121) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
5. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
6. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]

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-2234-164-0 : Dec 15 2009 4:18PM – ROEDERS : Joint Inspection Required with HAMMONDS

7. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]
8. Fugitive VOC emissions from compressor skid shall be less than 0.3 lb/ day. [District Rule 2201]
9. VOC content of the total hydrocarbons in the gas stream handled shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
10. VOC content of the total hydrocarbons in the gas stream handled shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
11. VOC content shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
12. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
13. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201 and 4403]
14. All piping, connectors, valves, seals, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201 and 4403]
15. 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 shall be reported as a deviation. [District Rule 2201 and 4403]
16. All piping, connectors, valves, seals, and fittings 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 provisions of this permit. If any of the components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201and 4403]
17. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2201 and 4403]
18. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-165-0 **ISSUANCE DATE:** 08/08/2005

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-122) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
5. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
6. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services
S-2234-165-0 : Dec 15 2009 4:18PM – ROEDERS : Joint Inspection Required with HAMMONDS

7. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]
8. Fugitive VOC emissions from compressor skid shall be less than 0.3 lb/ day. [District Rule 2201]
9. VOC content of the total hydrocarbons in the gas stream handled shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
10. VOC content of the total hydrocarbons in the gas stream handled shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
11. VOC content shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
12. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
13. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201 and 4403]
14. All piping, connectors, valves, seals, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201 and 4403]
15. 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 shall be reported as a deviation. [District Rule 2201 and 4403]
16. All piping, connectors, valves, seals, and fittings 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 provisions of this permit. If any of the components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201and 4403]
17. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2201 and 4403]
18. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-166-0 **ISSUANCE DATE:** 08/08/2005

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-123) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
5. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
6. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services
S-2234-166-0 : Dec 15 2008 4:18PM – ROEDERS : Joint Inspection Required with HAMMONDS

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7. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]
8. Fugitive VOC emissions from compressor skid shall be less than 0.3 lb/ day. [District Rule 2201]
9. VOC content of the total hydrocarbons in the gas stream handled shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
10. VOC content of the total hydrocarbons in the gas stream handled shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
11. VOC content shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
12. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
13. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201 and 4403]
14. All piping, connectors, valves, seals, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201 and 4403]
15. 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 shall be reported as a deviation. [District Rule 2201 and 4403]
16. All piping, connectors, valves, seals, and fittings 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 provisions of this permit. If any of the components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201and 4403]
17. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2201 and 4403]
18. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-167-0 **ISSUANCE DATE:** 08/08/2005

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-124) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
5. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
6. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]

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-2234-167-0 : Dec 15 2008 4:18PM – ROEDERS : Joint Inspection Required with HAMMONDS

7. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]
8. Fugitive VOC emissions from compressor skid shall be less than 0.3 lb/ day. [District Rule 2201]
9. VOC content of the total hydrocarbons in the gas stream handled shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
10. VOC content of the total hydrocarbons in the gas stream handled shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
11. VOC content shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
12. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
13. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201 and 4403]
14. All piping, connectors, valves, seals, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201 and 4403]
15. 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 shall be reported as a deviation. [District Rule 2201 and 4403]
16. All piping, connectors, valves, seals, and fittings 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 provisions of this permit. If any of the components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201and 4403]
17. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Leaks over 10,000 ppmv shall be reported as a deviation. [District Rule 2201 and 4403]
18. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

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AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-172-0 **ISSUANCE DATE:** 09/20/2005

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 3 **TOWNSHIP:** 31S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
GLYCOL DEHYDRATION OPERATION INCLUDING 1.5 MMBTU/HR BURNER, A GLYCOL SURGE TANK, FLASH VESSEL AND GLYCOL REBOILER VENT, A LEAN/RICH GLYCOL EXCHANGER, AND VARIOUS PUMPS AND FILTERS WITH PROCESS VENT CONNECTED TO VACUUM GAS GATHERING SYSTEM

CONDITIONS

1. Glycol reboiler heater shall be fired on natural gas containing no more than 0.75 gr S/100scf and no more than 5% by weight hydrocarbons heavier that butane. [District Rule 2020]
2. Flash tank and dehydrator vent shall be vented to gas gathering system. [District Rules 2201 and 4408]
3. Only glycol shall be used as the dehydration medium. [District Rule 2201]
4. Condensate handling shall be conducted in closed systems resulting in fugitive component emissions only. [District Rule 2201]
5. Fugitive VOC emission rate, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities Table IV-2c less than or equal to 10,000 ppm (Feb 1999), from the total number of gas service and condensate (light liquid) components shall not exceed 0.4 lb/day. [District Rule 2201]
6. All piping, valves and other fittings shall be constructed and maintained in a gas-tight condition. "Gas-tight" shall be defined as emitting no more than 10,000 ppm of methane measured from the potential source with an instrument calibrated with methane in accordance with EPA Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and shall be reported as a deviation. [District Rules 2201 and 4408]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services
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7. Components shall be inspected for leaks at least quarterly using a portable hydrocarbon detection instrument. Any vapor leak greater than 7,500 ppmv, when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21, or condensate leaking at a rate greater than 3 drops of liquid per minute shall be repaired in a manner consistent with the procedures specified in Rule 4403 Sections 5.1.4, 5.1.5, and 5.1.6. [District Rules 2201 and 4403]
8. Permittee shall comply in full with all applicable Rule 4403 requirements. [District Rule 4403]
9. VOC content of gas processed shall not exceed 50% by weight. [District Rule 2201 and 1070]
10. VOC content of gas shall be measured initially and not less than annually thereafter using ASTM D1945-96, EPA Method 25 or EPA Method 18 referenced as methane. [District Rule 2201]
11. Permittee shall maintain monthly records of amount of gas dehydrated (MMSCF). [District Rule 4408]
12. Permittee shall maintain a written record of gas VOC content (sampled initially and annually). [District Rule 2201 and 1070]
13. All records required by this permit shall be maintained and be made readily available for District inspection upon request for a period of 5 years. [District Rules 1070 and 4408]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-175-0 **ISSUANCE DATE:** 10/16/2006

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 35 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
GAS DEHYDRATION SYSTEM INCLUDING; INLET GAS COALESCERS, MOLECULAR SIEVE DRYER BEDS, REGENERATION AND DRY GAS COOLERS, AND ELECTRIC MOTOR REGENERATION GAS COMPRESSOR (35R GAS PLANT)

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]
2. Permittee shall maintain an accurate, as-built, fugitive component count of components which are in VOC service (greater than 10% VOC by weight) and resultant emissions calculated using emission factors from "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c. Oil and Gas Production Screening Value Ranges Emission Factors. [District Rule 2201]
3. VOC emission rate from components in VOC service (>10% VOC by weight) associated with this emission unit shall be less than 0.7 lb/day. [District Rule 2201]
4. VOC content of the gas stream processed shall not exceed 50% of the total hydrocarbon content by weight. [District Rule 2201]
5. VOC content of the gas stream in VOC service (> 10% VOC by weight) shall be tested and recorded not less than every 12 month thereafter using methods ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
6. There shall be no leaks exceeding 10,000 ppmv VOCs. [District Rule 2201]

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Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services
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7. The permittee shall not use any components that leak in excess of the applicable leak standards as specified in District Rule 4409. Components that have been found leaking in excess of the applicable leak standards of Rule 4409 this rule may be used provided such leaking components have been identified with a tag for repair, are repaired, or are awaiting re-inspection after being repaired, within the applicable time period specified in Rule 4409. [District Rule 4409, 5.1.1]
8. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch or during attended repair replacement or maintenance operations provided such activities are done as expeditiously as possible and with minimal spillage of material an VOC emissions to the atmosphere. [District Rule 4409, 5.1.2]
9. For valves, threaded connections, flanges, pipes, pumps, compressors, and other components not specified in this permit; a major gas leak is a detection of > 10,000 ppmv as methane; a minor gas leak is a detection of 1,000 to 10,000 ppmv as methane when the component is in liquid service; a minor gas leak is a detection of 2,000 to 10,000 ppmv as methane when the component is in gas/vapor service. [District Rule 4409, 5.1.1]
10. For pressure relief devices (PRDs); a major gas leak is a detection of > 10,000 ppmv as methane; a minor gas leak is a detection of 200 to 10,000 ppmv as methane when the component is in liquid service; a minor gas leak is a detection of 400 to 10,000 ppmv as methane when the component is in gas/vapor service. [District Rule 4409, 5.1.1]
11. Minor gas leaks from PRSBs detected during any District inspection shall not be counted toward determination of compliance with this rule provided the permittee repairs, replaces, or removes leaking PRSBs from VOC service as soon as practicable but not later than seven calendar days. [District Rule 4409, 5.1.3.1.2]
12. Leaks detected during quarterly operator inspections shall not be counted towards determination of compliance with the provisions of Rule 4409 provided the leaking components are repaired as soon as practicable but not later than the time frame specified in this permit. Leaks detected during quarterly operator inspections that are not repaired, replaced, or removed from operation as soon as practicable but not later than the time frame specified in this rule shall be counted toward determination of compliance with the provisions of Rule 4409. [District Rule 4409, 5.1.3.2.1 and 5.1.3.2.2]
13. Leaking components at this facility detected during annual operator inspections, as required by Rule 4409 for a specific component type, that exceed the leak standards specified in this permit, shall constitute a violation of this rule. This violation is regardless of whether or not the leaking components are repaired, replaced, or removed from operation within the allowable repair time frame specified in this permit. [District Rule 4409, 5.1.3.2.3]
14. An open-ended line, or a valve located at the end of the line, that is not sealed with either a blind flange, a plug, a cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended line is a leak. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4409, 5.1.4.1]
15. A leak from a component is when there is a major liquid leak from the component. A major liquid leak from a component is when a visible mist or a continuous flow of liquid, that is not seal lubricant, leaks from the component. [District Rule 4409, 5.1.4.2]
16. A leak from a component is when gas emissions greater than 50,000 ppmv, as methane, leaks from the component. [District Rule 4409, 5.1.4.3]
17. A minor liquid leak from a component is when more than three drops of liquid per minute, that is not seal lubricant and is not a major liquid leak, leaks from the component. [District Rule 4409, 5.1.4.4]
18. When 200 or fewer valves are inspected, a leak from a valve is when more than one valve has a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 valves are inspected, a leak from a valve is when more than 0.5 % (rounded up to the nearest whole number) of the valves have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]

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19. When 200 or fewer threaded connections are inspected, a leak from a threaded connection is when more than one threaded connection has a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 threaded connections are inspected, a leak from a threaded connection is when more than 0.5 % (rounded up to the nearest whole number) of the threaded connections have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]
20. When 200 or fewer flanges are inspected, a leak from a flange is when more than one flange has a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 flanges are inspected, a leak from a flange is when more than 0.5 % (rounded up to the nearest whole number) of the flanges have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]
21. When 200 or fewer pumps are inspected, a leak from a pump is when more than two pumps have a minor liquid leak, a minor gas leak, or a gas leak greater than 10,000 ppmv and less than or equal to 50,000 ppmv. When greater than 200 pumps are inspected, a leak from a pump is when more than 1.0 % (rounded up to the nearest whole number) of the pumps have a minor liquid leak, a minor gas leak, or a gas leak greater than 10,000 ppmv and less than or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]
22. When compressors, PRDs, or other components not specified in this permit are inspected, a leak from these components is when more than one component has a minor liquid leak, a minor gas leak, or a gas leak greater than 10,000 ppmv and less than or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]
23. When 200 or fewer PRSBs are inspected, a leak is when more than four have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 PRSBs are inspected, a leak is when more than 2.0 % (rounded up to the nearest whole number) of the PRSBs have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]
24. When 200 or fewer wells at light crude oil or gas production facilities are inspected, a leak from a pipe is when more than two or more pipes have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 wells at light crude oil or gas production facilities are inspected, a leak from a pipe is when more than 1.0 % (rounded up to the nearest whole number) of the pipes have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]
25. When pipes at natural gas processing facilities are inspected, a leak from a pipe is when more than two have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]
26. For manned facilities all accessible operating pumps, compressors, and PRDs, in service, shall be audio-visually inspected for leaks at least once every 24 hours except when operators do not report to the facility during a 24 hour period. [District Rule 4409, 5.2.1]
27. For unmanned facilities all accessible operating pumps, compressors, and PRDs, in service, shall be audio-visually inspected for leaks at least once per calendar week. [District Rule 4409, 5.2.2]
28. Any audio visual inspection of all accessible operating pumps, compressors and PRDs performed by an operator that indicate a leak that cannot be immediately repaired to meet the applicable leak standards of Rule 4409, shall be inspected not later than 24 hours after conducting the audio visual inspection. If the leak is found, the leak shall be repaired as soon as practical but not later than the time frame specified in Rule 4409. [District Rule 4409, 5.2.3]
29. Except for inaccessible components, unsafe-to-monitor components, or pipes, all components, in service, shall be tested for leaks at least once every calendar quarter. [District Rule 4409, 5.2.4]
30. All new, replaced, or repaired fittings, flanges, and threaded connections shall be tested for leaks immediately after being placed into service. [District Rule 4409, 5.2.5]
31. All inaccessible components shall be tested for leaks at least once every 12 months. [District Rule 4409, 5.2.6]
32. All unsafe-to-monitor components shall be tested for leaks during each turnaround. [District Rule 4409, 5.2.7]
33. All pipes shall be visually inspected for leaks at least once every 12 months. [District Rule 4409, 5.2.8]

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34. Any visual inspection of pipes that indicate a leak that cannot be immediately repaired to meet the applicable leak standards of Rule 4409, shall be inspected not later than 24 hours after conducting the audio visual inspection. If a leak is found, the leak shall be repaired as soon as practical but not later than the time frame specified in Rule 4409. [District Rule 4409, 5.2.8.1]

35. The annual pipe inspection required by either the Department of Oil, Gas, and Geothermal Resources (DOGGR) pursuant to California Code of Regulation Title 14, Division 2, Subchapter 2, Section 1774 (Oilfield Facilities and Equipment Maintenance), or by the Spill Prevention Control and Countermeasure Plan (SPCC) pursuant to 40 Code of Federal Regulation Part 112 (Oil Prevention and Response: Non- Transportation-Related Onshore and Offshore Facilities) can be used as the annual pipe inspection required by District Rule 4409. [District Rule 4409, 5.2.8.2]

36. Except for pumps, compressors, and PRDs, the permittee may apply for written approval from the District to change the inspection frequency of accessible components from quarterly to annually for a specific component type provided the following two qualifying requirements are met. During the previous five consecutive quarterly inspections, for the specific component type, there shall be no more leaks than as allowed by this permit. The permittee also shall not have received a Notice of Violation (NOV) from the District during the previous 12 months for violating any provisions of District Rule 4409 for the specific component type. If these two qualifying requirements have not been met, then the inspection frequency shall revert back to quarterly. The written request shall include pertinent documentation to demonstrate that the operator has successfully met the two qualifying requirements. [District Rule 4409, 5.2.9 and 5.2.10]

37. The permittee shall notify the District in writing within five calendar days after changing the inspection frequency for a specific component type. The written notification shall include the reason(s) and date of change to a quarterly inspection frequency. [District Rule 4409, 5.2.11]

38. Except as otherwise provided by District Rule 4409 for inaccessible components or unsafe to monitor components, PRDs that releases to the atmosphere shall be inspected for leaks as soon as practicable but not later than 24 hours after the time of the release. The permittee shall re-inspect the PRD for leaks not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the initial release. If the PRD is found by the permittee to be leaking during either inspection, the PRD leak shall be treated as if the leak was found during the required quarterly operator inspections. [District Rule 4409, 5.2.12]

39. Except for PRDs, a component shall be inspected for leaks not later than 15 calendar days after repairing the leak or replacing the component. [District Rule 4409, 5.2.13]

40. District inspections shall not be counted as an operator inspection required by District Rule 4409. Any attempt by an operator to count such District inspections as part of the operator's mandatory inspections is considered a willful circumvention of the rule and is a violation of this rule. [District Rule 4409, 5.2.14]

41. Upon detection of a leaking component (including those detected by audio-visual inspection), an operator shall affix to that component a weatherproof, readily visible tag, bearing the date and time when the leak was detected and the date and time of the leak measurement. For gaseous leaks, the tag shall indicate the leak concentration in ppmv. For liquid leaks, the tag shall indicate whether it is a major liquid leak or a minor liquid leak. The tag shall indicate, when applicable, whether the component is an essential component, an unsafe-to-monitor component, or a critical component. The tag shall remain in place until the leaking component is repaired or replaced and reinspected and found to be in compliance with the requirements of this rule. [District Rule 4409, 5.3.1]

42. The operator shall minimize all component leaks immediately, to the extent possible, but not later than one hour after detection of the leak in order to stop or reduce leakage to the atmosphere. If the leak has been minimized but the leak still exceeds the applicable leak standards specified in District Rule 4409, the operator shall do one of the following: 1) repair or replace the leaking component within the applicable time frame specified in District Rule 4409; 2) vent the leaking component to a closed vent system as defined by District Rule4409; 3) or remove the leaking component from operation.. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period. The start of the repair period shall be the time of the initial leak detection. [District Rule 4409, 5.3.4 and 5.3.5]

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43. The operator shall repair minor gas leaks within seven days. The operator shall repair major gas leaks, which are > 10,000 ppmv but < or equal to 50,000 ppmv, within three days. The operator shall repair major gas leaks, which are > 50,000 ppmv, within two days. The operator shall repair minor liquid leaks within three days. The operator shall repair major liquid leaks within two days. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period. The start of the repair period shall be the time of the initial leak detection. [District Rule 4409, 5.3.4 and 5.3.5]

44. For each calendar quarter, the operator may extend the repair period for a total number of leaking components, not to exceed 0.05 % of the number of components inspected, by type, rounded upward to the nearest whole number. The repair period for minor gas leaks can be extended by seven additional days. The repair period for major gas leaks, which are > 10,000 ppmv but < or equal to 50,000 ppmv, can be extended by two additional days. [District Rule 4409, 5.3.5]

45. If a leaking component is an essential component or a critical component and which cannot be shut down immediately for repairs, the operator shall do the following: 1) minimize the leak within one hour after detection of the leak; 2) and if the leak has been minimized, but the leak still exceeds the applicable leak standards of Rule 4409 as specified in this permit, the essential component or critical component shall be repaired or replaced to eliminate the leak during the next process unit turnaround. The repair shall occur no later than one year from the date of the original leak detection. [District Rule 4409, 5.3.6]

46. For any component that has incurred five repair actions for major gas leaks or major liquid leaks, or a combination of major gas leaks and major liquid leaks within a continuous 12-month period, the operator shall do one of the following four options. Options 1a through 1f require written notification to the District, option 2 requires written notification to the District and written District approval, options 3 and 4 do not require written notification to the District: 1a) For compressors replace the existing seal with either a dual mechanical seal, an oil film seal, a gas seal, or a face-type seal; 1b) for pumps replace the pump with a seal-less pump or replace the seal with a dual mechanical seal; 1c) for PRDs replace the PRD and install a rupture disc in the line which precedes the PRD such that the PRD is in series with and follows the rupture disc; 1d) for valves replace the valve with a sealed bellows valve, or for seal rings install graphite or Teflon chevron seal rings in a live-loaded packing gland; 1e) for threaded connections weld the connections or replace threaded connections with flanges; 1f) for sampling connections replace the sampling connection with a closed-loop sampling system; 2) Replace the component with Achieved-in-Practice Best Available Control Technology (BACT) equipment; 3) Vent the component to a District approved closed-vent system; 4) Remove the component from operation. For any component that is accessible, is not unsafe-to-monitor, is not an essential component, or is not a critical component, the operator shall comply with these requirements as soon as practicable but not later than twelve months after the date of detection of the fifth major leak within a continuous 12-month period. For any component that is inaccessible, is unsafe-to-monitor, is essential, or is a critical component, the operator shall comply with these requirements as soon as practicable but not later than the next turnaround or not later than two years after the date of detection of the fifth major leak within a continuous 12-month period, whichever comes first. [District Rule 4409, 5.3.7]

47. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and recordkeeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other system approved by the District that enables an operator or the District to locate each individual component. The operator shall replace physical identifications that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. [District Rule 4409, 5.4.1]

48. The operator shall keep a copy of the District approved Operator Management Plan (OMP) at the facility and make it available to the District, ARB, and EPA upon request. [District Rule 4409, 6.1.2]

49. By January 30th of each year the operator shall submit to the District for approval, in writing, an annual report indicating any changes to the existing OMP on file at the District. [District Rule 4409, 6.1.4]

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50. The operator shall maintain an inspection log that has been signed and dated by the facility operator responsible for the inspection, certifying the accuracy of the information recorded in the log. The inspection log shall contain, at a minimum, all of the following information: 1) The total number of components inspected, and the total number and percentage of leaking components found by component types; 2) The location, type, name or description of each leaking component and the description of any unit where the leaking component is found; 3) Date of the leak detection and method of the leak detection; 4) For gaseous leaks, record the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak; 5) The date of repair, replacement, or removal from operation of the leaking component(s); 6) The identification and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes first; 7) The method(s) used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier; 8) The date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced; 9) The inspector's name, business mailing address, and business telephone number. [District Rule 4409, 6.2.1]

51. Records of leaks detected during quarterly or annual operator inspections, and each subsequent repair and re-inspection, shall be submitted to the District, ARB, and EPA upon request. [District Rule 4409, 6.2.2]

52. Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components. The records shall include a copy of the current calibration gas certification from the vendor of the calibration gas cylinder, the date of calibration, the concentration of calibration gas, the instrument reading of calibration gas before adjustment, the instrument reading of calibration gas after adjustment, the calibration gas expiration date, and the calibration gas cylinder pressure at the time of calibration. [District Rule 4409, 6.2.3]

53. All records required by this permit shall be retained on-site for a minimum of five years and made available for District, ARB, and EPA inspection upon request. [District Rule 4409, 6.2.4]

54. For determining compliance with Rule 4409, all measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instructions not more than 30 days prior to its use. [District Rule 4409, 6.3.1]

55. For determining compliance with Rule 4409, the VOC content by weight percent shall be determined using ASTM D-1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 for liquids. [District Rule 4409, 6.3.2]

56. The percent by volume liquid evaporated at 302 °F (150 °C) shall be determined using ASTM D-86. [District Rule 4409, 6.3.3]

57. The TVP of any organic liquid shall be determined by measuring the Reid Vapor Pressure (RVP) using ASTM D-323, and converting the RVP to TVP at the maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance with the procedures specified in Appendix A of District Rule 4409. [District Rule 4409, 6.3.4]

58. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM D-287 or ASTM 1298. Sampling for API gravity shall be performed in accordance with ASTM D-4057. [District Rule 4409, 6.3.5]

59. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4409, 6.3.6]

60. For determining compliance with Rule 4409, halogenated exempt compounds shall be analyzed by EPA Method 18 or ARB Method 422. [District Rule 4409, 6.3.7]

61. Equipment that is in vacuum service is exempt from the control and monitoring requirements and work practice standards of District Rule 4409 and applicable NSPS requirements, provided the equipment is identified as such in the Operator Management Plan. [District Rule District Rule 4409, 4.2.8 and 40 CFR 60.482-1(d)]

CONDITIONS CONTINUE ON NEXT PAGE

62. For determining compliance with applicable NSPS requirements, the test methods and procedures at 40 CFR 60.485 shall be used. Alternative test methods may be used subject to approval pursuant to 40 CFR 60.8. [40 CFR 60.8, 40 CFR 60.485]

63. For all components that are subject to applicable requirements of District Rule 4409 and are included in the operator management plan and that comply with the inspection, maintenance and repair requirements as specified by Rule 4409, a Title-V permit shield for applicable Rule 4409 requirements is granted. [District Rule 4409]

64. For all components that are subject to applicable NSPS requirements and are included in the permit unit addendum to the operator management plan and that comply with the applicable NSPS inspection, maintenance and repair requirements as specified by the terms and condition of this permit, a Title-V permit shield is granted for applicable requirements at 40 CFR 60, Subpart KKK. [District Rule 40 CFR 60, Subpart KKK]

65. If a vapor collection system or closed vent system is operated under a vacuum, it is exempt from the inspection requirements as specified in this permit unit. [District Rule 4409, 4.2.8 and 40 CFR 60.482-10(i)]

66. For open ended lines and open ended valves, subject to applicable NSPS, each open-ended valve or line shall be sealed with two (2) valves, a blind flange, a cap, or a plug at all times, except during operations requiring process fluid flow through the valve or line. Open ended lines and valves designed to open automatically in the event of an emergency are exempt from this requirement [40 CFR 60.482-6(a) and 40 CFR 60.482-6(d)]

67. For valves subject to applicable new source performance standards (NSPS), any valve in gas/vapor service or light liquid service that is designated in the Operator Management Plan as an unsafe-to-monitor valve is exempt from the monthly NSPS leak inspection requirements, provided: 1) the owner/operator demonstrates the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence, and 2) a written plan is adhered to that requires monitoring of the valve as frequently as practicable during safe-to-monitor times and at least annually and during shutdown. [40 CFR 60.482-7(g)]

68. For valves subject to applicable NSPS, any valve in gas/vapor service or light liquid service that is designated in the Operator Management Plan as a difficult-to-monitor (inaccessible) valve is exempt from the monthly NSPS leak inspection requirements, provided: 1) the owner/operator demonstrates the valve cannot be monitored without elevating the monitoring personnel more than 15 feet above a support surface, or that it is over 6 feet away from a platform , 2) the process unit within which the valve is located either becomes an affected facility through 40 CFR 60.14 or 60.15 or if the owner/operator designates less than 3.0% of the total number of valves as difficult-to-monitor, and 3) a written plan is adhered to that, requires monitoring of the valve at least annually and during shutdown. [40 CFR 60.482-7(h)]

69. Any components of the closed vent system that are designated as unsafe to inspect are exempt from the inspection requirements specified in this permit unit if the owner or operator complies with the following: 1) the owner or operator determines that the equipment is unsafe to inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying with the inspection requirements; 2) the owner or operator identifies the components in the Operator Management Plan; 3) the owner or operator has a written plan that requires inspection of the equipment as frequently as practicable during safe-to-inspect times; and 4) inspection and required repair of the components is performed at least annually and during shutdown. [District Rule 4409, 5.3.7.5 and 40 CFR 60.482-10(j)]

70. For components subject to applicable NSPS, when a leak is detected, a weatherproof and readily visible tag shall be attached, bearing the equipment identification number and date which the leak is detected. The tag on a valve shall remain in place until after it has been monitored for 2 successive months and no leak has been detected. The tag on all other equipment may be removed after repair and re-inspection document compliance with the applicable NSPS. [40 CFR 60.486(b) and 60.635(b)(1)]

71. Any leak detected on the basis of sight, smell, or sound shall be identified by the operator affixing a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until repair and reinspection document compliance, whether or not operator inspection is otherwise required by this permit. [District Rule 4409, 5.3.3 and5.3.3]

72. Any leaking component and any leak shall be repaired to a leak-free condition and reinspected within 15 calendar days. [40 CFR 60.482-7]

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73. For components subject to applicable NSPS standards, except as otherwise provided by 40 CFR 60.482-9, any component leak shall be repaired to a leak-free condition, or vented to a flare satisfying the requirements of 40 CFR 60.18, or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 or EPA Method 18 within fifteen (15) calendar days of detection. A first attempt at repair shall be made no later than 5 calendar days after leak detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates necessary and sufficient actions are being taken to correct the leak within this time period. [40 CFR 60.482-2(c)(1) and (c)(2), 60.482-3(g), 60.482-7(d), 60.482-8(c), and 60.633(b)(3)]

74. For components subject to applicable NSPS, if the leaking component is an essential part of a critical process identified in the operator management plan and which cannot be immediately shut down for repairs, the operator shall minimize the leak within 15 calendar days. If the leak which has been minimized still exceeds the applicable NSPS standard, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than six months from the date of the original leak detection for pumps and one year from the date of the original leak detection for other components. Delay of repair is allowed for equipment which is isolated from the process and which does not remain in VOC service and delay of repair is is allowed pursuant to 40 CFR 60.482-2(c)(1), 40 CFR 60.482-3(g)(1), 40 CFR 60.482-4(b)(1), 40 CFR 60.482-7(d)(1),40 CFR 60.482-8(c)(1) [40 CFR 60.482- 2(c)(1). [40 CFR 40 CFR 60.482-3(g)(1), 40 CFR 60.482-4(b)(1), 40 CFR 60.482-7(d)(1),40 CFR 60.482-8(c)(1), 60.482-9(a) and (b)]

75. Delay of repair of a closed vent system for which leaks have been detected is allowed if the closed vent system is an essential part of a critical process identified in the operator management plan which cannot be immediately shut down for repairs or if the owner or operator determines that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair. However the operator shall minimize the leak within 15 calendar days. If the leak which has been minimized still exceeds the limit in this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. [40 CFR 60.482-9]

76. For the purpose of determining compliance with District Rule 4409, the operator shall maintain an inspection log that has been signed and dated by the facility operator responsible for the inspection, certifying the accuracy of the information recorded in the log. The inspection log shall contain all of the following information: 1) The total number of components inspected, and the total number and percentage of leaking components found by component types; 2) The location, type, name or description of each leaking component and the description of any unit where the leaking component is found; 3) Date of the leak detection and method of the leak detection; 4) For gaseous leaks, record the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak; 5) The date of repair, replacement, or removal from operation of the leaking component(s); 6) The identification and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes first; 7) The method(s) used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier; 8) The date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced; 9) The inspector's name, business mailing address, and business telephone number. [District Rule 4409, 6.2.1]

77. For the purpose of determining compliance with applicable NSPS, each operator shall maintain an inspection log for the components subject to NSPS inspection requirements that contains the following information: 1) instrument, operator, and equipment identification numbers; 2) date of leak detection; 3) dates and repair method of each attempt to repair the leak; 4) "above 10,000" if the maximum instrument reading after each repair attempt is equal to or greater than 10,000 ppm; 5) "repair delayed", reason for delay, signature of individual whose decision it was that repair could not be effected without a process shutdown, and expected date of successful repair if a leak is not repaired within 15 days of detection; 6) dates of process unit shutdown that occur while the equipment is unrepaired; 7) date of successful repair and emission level of recheck after leak is repaired. [District Rule 40 CFR 60.486(c) and 60.635(2)(i) through (ix)]

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78. Each piece of equipment subject to requirements of this permit is presumed to be in VOC service or in wet gas service unless an owner or operator demonstrates that the piece of equipment is not in VOC service or in wet gas service. For a piece of equipment to be considered not in VOC service, it must be determined that the VOC content can be reasonably expected never to exceed 10.0 percent by weight. For a piece of equipment to be considered in wet gas service, it must be determined that it contains or contacts the field gas before the extraction step in the process. For purposes of determining the percent VOC content of the process fluid that is contained in or contacts a piece of equipment, procedures that conform to the methods described this permit shall be used. [40 CFR 60.485(d) and 60.632(f)]

79. Compliance the no detectable emission standards for this permit unit shall be determined as follows: 1) EPA Method 21 shall be followed, 2) Method 21 shall be used to determine the background level and all potential leak interfaces shall be traversed as close to the inter face as possible, and 3) the arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 500 ppm to determine compliance. [40 CFR 60.485(c)]

80. For valves subject to applicable NSPS, if the operator elects to comply with the allowable percentage of leaking valves then for this permit unit, the operator shall notify the APCO 90 days before implementing these alternatives. [40 CFR 60.483-1(b)(1) and (d), 60. 483-2(a)(2), and 60.487(d)]

81. For valves subject to applicable NSPS, if the allowable percentage of leaking valves is selected, then a performance test shall be conducted initially upon designation for allowable percentage of leaking valves, annually, and at other times requested by the APCO. The performance test shall be conducted as follows: 1) all valves in gas/vapor and light liquid service shall be monitored within 1 week using EPA Method 21 and 2) the leak percentage shall be determined by dividing the number of leaking valves detected and valves for which repair has been delayed by the number of valves in gas/vapor and light liquid service in this permit unit, 3) a record must be kept of the percent of valves found leaking during each leak detection period. [40 CFR 60.483-1(b)(2) and (c) and 60. 483-2(b)(5) and (6)]

82. For compressors subject to applicable NSPS, each compressor shall meet the applicable control system requirements of 40 CFR 482-3(a) - (i), except as otherwise provided by 40 CFR 60.482-1(c) and 40 CFR 60.482-3(h) and (i). [40 CFR 60.482-3(a) through (j)], 40 CFR 60.482-1(c), 40 CFR 60.482-3(h) and (i), and 40 CFR 60.633]

83. Compressors that are subject to applicable NSPS, are exempt from requirements of 40 CFR 60.482-3(a) and 40 CFR 60.482-3(b) if the compressor is equipped with a closed vent system to capture and transport leakage from the compressor drive shaft back to a process fuel gas system or a control device. Closed vent systems piping shall comply with applicable requirements at 40 CFR 60.482-10. Closed vent vapor recovery systems shall comply with design requirements at 40 CFR 60.482-10(b). Enclosed combustion devices used by closed vent system shall comply with design requirements at 40 CFR 60.482-10(c). Flares used by closed vent systems shall comply with requirements at 40 CFR 60.482-10(d). Closed vent system control devices shall comply with monitoring requirements at 40 CFR 60.482-10(e). [40 CFR 60 .482-3, 40 CFR 60.482-10]

84. Compressors that are subject to applicable NSPS and are designated in the Operator Management Plan for no detectable leak emission, as indicated by an instrument reading of less than 500 ppm above background, is are exempt from the requirements of 40 CFR 482-3(a)-(h), provided the compressor is tested for compliance with no detectable emissions initially upon designation, annually, and at other times requested by the APCO. [40 CFR 60.482-3(i)]

85. When determining compliance with applicable NSPS, if an instrument reading of 10,000 ppm or greater is measured, a leak is detected. [40 CFR 60.633(b)(2), 40482-7(a), (b), and (c]

86. For open ended lines or valves subject to applicable NSPS, each open-ended valve or line equipped with a second valve shall be operated so that the valve on the process fluid end is closed before the second valve is closed. [40 CFR 60.482-6(b)]

87. For equipment subject to applicable NSPS when a double block-and-bleed system is being used, the bleed valve or line may remain open only during operations that require venting the line between the block valves. [40 CFR 60.482-6(c)]

88. Except as provided by applicable NSPS, valves that are subject to NSPS that are in gas/vapor service or light liquid service shall be monitored monthly to detect leaks using EPA Method 21. Any valve for which a leak is not detected for 2 successive months may be monitored the first month of every quarter. If a leak is subsequently detected, monitoring shall revert to monthly. [40 CFR 60.482-7(a), (b), and (c)]

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89. Any valve in gas/vapor service or light liquid service that is designated in the equipment log list for no detectable leak emission, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the monitoring requirements of 40 CFR 60.482-7(a), provided the valve: 1) has no external actuating mechanism in contact with the process fluid and 2) is tested for and meets compliance with no detectable leak emission initially upon designation, annually and at other times requested by the APCO. [40 CFR 60.482-7(f)]

90. For valves subject to applicable NSPS requirements, for a valve in gas/vapor service or light or heavy liquid service, first attempts at repair shall include the following where practicable: 1) tightening of bonnet bolts, 2) replacement of bonnet bolts, 3) tightening of packing gland nuts, and 4) injection of lubricant into lubricant packing. [40 CFR 60.482-7(e) and 60.482-8(d)]

91. For pumps and valves in heavy liquid service, pressure relief devices in light or heavy liquid service, and flanges and other connectors, that are subject to applicable NSPS requirements, if evidence of a potential leak is found by sight, sound, smell, or any other detection method then the device shall be monitored within 5 days for leak detection in accordance with EPA Method 21. A leak is detected if an instrument reading of 10,000 ppm or greater is measured. [40 CFR 60.482-8(a) and (b)]

92. In addition to the information required by Rule 4409, the operator management plan shall include an addendum for this permit unit containing the following applicable NSPS information: 1) list of identification numbers for equipment subject to the applicable NSPS requirements, 2) list of identification numbers for equipment which is designated for no detectable emissions and which is signed by the owner/operator, 3) list of equipment identification numbers for pressure relief devices which must be operated with no detectable emissions, 4) dates of each compliance test for emissions below 500 ppm, for all equipment subject to this no detectable emission limit and the background level measured and the maximum instrument reading measured at the equipment, during each test, and 5) list of identification numbers for equipment in vacuum service. [40 CFR 60.486(e) and 60.635(b)(2)(x)]

93. In addition to the information required by Rule 4409, the operator management plan shall include an addendum for this permit unit containing the following applicable NSPS information: for valves in gas/vapor service and light liquid service: 1) a list of identification numbers for valves designated "unsafe-to-monitor" and for valves designated "difficult-to monitor", 2) an explanation for each valve stating why it is so designated, and 3) the schedule for monitoring each such valve. [40 CFR 60.486(f)]

94. For valves subject to NSPS annual leak detection alternative requirements, the NSPS inspection log shall include the following information: 1) a schedule of monitoring and 2) the percent of valves found leaking during each monitoring period. [CFR 60.486(g)]

95. A log containing the following information for pumps and compressors equipped a barrier fluid seal system which includes a seal failure sensor, for which a system failure criteria is required to be established, pursuant to the requirements for this permit unit, shall be maintained and kept in a readily accessible location: 1) the design criterion required by this permit and an explanation and 2) any changes to this criterion and reasons for the changes. [40 CFR 60.486(h)]

96. For equipment (compressors and components) subject to applicable NSPS, the operator shall maintain information and data used to demonstrate that a piece of equipment is not in VOC service and information and data used to demonstrate that a reciprocating compressor is in wet gas service. The information shall be included in the NSPS inspection log for the permit unit and shall be kept in a readily accessible location. [40 CFR 60.486(j) and 60.635(c)]

97. Vapor recovery systems (for example, condensers and absorbers) shall be designed and operated to recover the VOC emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 parts per million by volume, whichever is less stringent. [40 CFR 60.482-10(b)]

98. Enclosed combustion devices shall be designed and operated to reduce the VOC emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 parts per million by volume, on a dry basis, corrected to 3 percent oxygen, whichever is less stringent or to provide a minimum residence time of 0.75 seconds at a minimum temperature of 816 °C. [40 CFR 60.482-10(c)]

99. If the vapor collection system or closed vent system is constructed of hard-piping, the owner or operator shall conduct an initial inspection according to the procedures specified in EPA Method 21 using the calibration gases as specified in the requirements for this permit unit. The owner or operator shall also conduct annual visual inspections for visible, audible, or olfactory indications of leaks. [40 CFR 60.482-10(f)(1) and 40 CFR 60.485(b)]

CONDITIONS CONTINUE ON NEXT PAGE

100. If the vapor collection system or closed vent system is constructed of ductwork, the owner or operator shall conduct an initial inspection and annual inspections according to the procedures specified in EPA Method 21 using the calibration gases as specified in the requirements for this permit unit. The owner or operator shall also conduct annual visual inspections for visible, audible, or olfactory indications of leaks. [40 CFR 60.482-10(f)(2) and 40 CFR 60.485(b)]

101. Any parts of the closed vent system that are designated as difficult to inspect are exempt from the inspection requirements of 40 CFR 60.482-10(f)(1) and (f)(2) if the owner or operator complies with the following: 1) the owner or operator determines that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters above a support surface; and 2) the process unit within which the closed vent system is located becomes an affected facility through modification or reconstruction, as defined in 40 CFR 60.14 and 60.15, or the owner or operator designates less than 3.0 percent of the total number of closed vent system equipment as difficult to inspect; and 3) the owner or operator has a written plan that requires inspection of the equipment at least every 5 years. A closed vent system is exempt from inspection if it is operated under a vacuum. [40 CFR 60.482-10(k)]

102. Closed vent systems and control devices shall be operated at all times when emissions may be vented to them. [40 CFR 60.482-10(m)]

103. A log shall be maintained containing the following information: 1) identification of all parts of the closed vent system that are designated as unsafe to inspect, an explanation of why the equipment is unsafe to inspect, and the plan for inspecting the equipment; 2) identification of all parts of the closed vent system that are designated as difficult to inspect, an explanation of why the equipment is difficult to inspect, and the plan for inspecting the equipment; 3) for each inspection conducted in accordance with EPA Method 21 during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected; and 4) for each visual inspection conducted for visible, audible, or olfactory indications of leaks during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected. [40 CFR 60.482-10(l) and 40 CFR 60.485(b)]

104. For components subject to applicable NSPS requirements, semiannual reports shall be submitted to the APCO containing the following information: 1) process unit identification, 2) for each month during the reporting period, number of valves, pumps, compressors, and pressure relief devices for which leaks were detected; number of valves, pumps, compressors, and pressure relief devices for which leaks were not repaired within 15 days and a first attempt not made within 5 days of leak detection; the facts that explain each delay of repair and, where appropriate, why a process unit shutdown was technically infeasible 3) dates of process unit shutdowns which occurred within the reporting period, and 4) revisions to items reported in the initial or subsequent semiannual reports. [40 CFR 60.487(a) and (c) and 60.636(c)]

105. All logs required for this permit unit and all records of required monitoring data and support information shall be retained by the operator for a minimum of five years after the date of an entry, kept in a readily accessible location, and made available upon request to District personnel. [District Rules 2520, 9.4.2 and 4409, 6.2.3]

106. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 91 lb, 2nd quarter - 91 lb, 3rd quarter - 91 lb, and fourth quarter - 91 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 12/15/05). [District Rule 2201]

107. ERC Certificate Number S-1668-1 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-176-0 **ISSUANCE DATE:** 10/16/2006

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 35 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
NATURAL GAS CO2 REMOVAL SYSTEM INCLUDING; MOLECULAR SIEVE CO2 REMOVAL BEDS, FIN-FAN GAS COOLERS, NITROGEN DRYING BEDS, LIQUID KNOCKOUT VESSELS AND ELECTRIC MOTOR CO2 REMOVAL COMPRESSOR(S) (35R GAS PLANT)

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]
2. Permittee shall maintain an accurate, as-built, fugitive component count of components which are in VOC service (greater than 10% VOC by weight) and resultant emissions calculated using emission factors from "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c. Oil and Gas Production Screening Value Ranges Emission Factors. [District Rule 2201]
3. VOC emission rate from components in VOC service (>10% VOC by weight) associated with this emission unit shall be less than 0.3 lb/day. [District Rule 2201]
4. VOC content of the gas stream processed shall not exceed 50% of the total hydrocarbon content by weight. [District Rule 2201]
5. VOC content of the gas stream in VOC service (> 10% VOC by weight) shall be tested and recorded not less than every 12 month thereafter using methods ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]

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-2234-176-0 : Dec 15 2009 4:18PM – ROEDERS : Joint Inspection Required with BUSSM

6. VOC content of the regeneration gas stream (< 10% VOC by weight) shall be tested and recorded not less than every 12 month thereafter using methods ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
7. There shall be no leaks exceeding 10,000 ppmv VOCs. [District Rule 2201]
8. The permittee shall not use any components that leak in excess of the applicable leak standards as specified in District Rule 4409. Components that have been found leaking in excess of the applicable leak standards of Rule 4409 this rule may be used provided such leaking components have been identified with a tag for repair, are repaired, or are awaiting re-inspection after being repaired, within the applicable time period specified in Rule 4409. [District Rule 4409, 5.1.1]
9. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch or during attended repair replacement or maintenance operations provided such activities are done as expeditiously as possible and with minimal spillage of material an VOC emissions to the atmosphere. [District Rule 4409, 5.1.2]
10. For valves, threaded connections, flanges, pipes, pumps, compressors, and other components not specified in this permit; a major gas leak is a detection of > 10,000 ppmv as methane; a minor gas leak is a detection of 1,000 to 10,000 ppmv as methane when the component is in liquid service; a minor gas leak is a detection of 2,000 to 10,000 ppmv as methane when the component is in gas/vapor service. [District Rule 4409, 5.1.1]
11. For pressure relief devices (PRDs); a major gas leak is a detection of > 10,000 ppmv as methane; a minor gas leak is a detection of 200 to 10,000 ppmv as methane when the component is in liquid service; a minor gas leak is a detection of 400 to 10,000 ppmv as methane when the component is in gas/vapor service. [District Rule 4409, 5.1.1]
12. Minor gas leaks from PRSBs detected during any District inspection shall not be counted toward determination of compliance with this rule provided the permittee repairs, replaces, or removes leaking PRSBs from VOC service as soon as practicable but not later than seven calendar days. [District Rule 4409, 5.1.3.1.2]
13. Leaks detected during quarterly operator inspections shall not be counted towards determination of compliance with the provisions of Rule 4409 provided the leaking components are repaired as soon as practicable but not later than the time frame specified in this permit. Leaks detected during quarterly operator inspections that are not repaired, replaced, or removed from operation as soon as practicable but not later than the time frame specified in this rule shall be counted toward determination of compliance with the provisions of Rule 4409. [District Rule 4409, 5.1.3.2.1 and 5.1.3.2.2]
14. Leaking components at this facility detected during annual operator inspections, as required by Rule 4409 for a specific component type, that exceed the leak standards specified in this permit, shall constitute a violation of this rule. This violation is regardless of whether or not the leaking components are repaired, replaced, or removed from operation within the allowable repair time frame specified in this permit. [District Rule 4409, 5.1.3.2.3]
15. An open-ended line, or a valve located at the end of the line, that is not sealed with either a blind flange, a plug, a cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended line is a leak. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4409, 5.1.4.1]
16. A leak from a component is when there is a major liquid leak from the component. A major liquid leak from a component is when a visible mist or a continuous flow of liquid, that is not seal lubricant, leaks from the component. [District Rule 4409, 5.1.4.2]
17. A leak from a component is when gas emissions greater than 50,000 ppmv, as methane, leaks from the component. [District Rule 4409, 5.1.4.3]
18. A minor liquid leak from a component is when more than three drops of liquid per minute, that is not seal lubricant and is not a major liquid leak, leaks from the component. [District Rule 4409, 5.1.4.4]
19. When 200 or fewer valves are inspected, a leak from a valve is when more than one valve has a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 valves are inspected, a leak from a valve is when more than 0.5 % (rounded up to the nearest whole number) of the valves have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]

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20. When 200 or fewer threaded connections are inspected, a leak from a threaded connection is when more than one threaded connection has a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 threaded connections are inspected, a leak from a threaded connection is when more than 0.5 % (rounded up to the nearest whole number) of the threaded connections have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]

21. When 200 or fewer flanges are inspected, a leak from a flange is when more than one flange has a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 flanges are inspected, a leak from a flange is when more than 0.5 % (rounded up to the nearest whole number) of the flanges have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]

22. When 200 or fewer pumps are inspected, a leak from a pump is when more than two pumps have a minor liquid leak, a minor gas leak, or a gas leak greater than 10,000 ppmv and less than or equal to 50,000 ppmv. When greater than 200 pumps are inspected, a leak from a pump is when more than 1.0 % (rounded up to the nearest whole number) of the pumps have a minor liquid leak, a minor gas leak, or a gas leak greater than 10,000 ppmv and less than or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]

23. When compressors, PRDs, or other components not specified in this permit are inspected, a leak from these components is when more than one component has a minor liquid leak, a minor gas leak, or a gas leak greater than 10,000 ppmv and less than or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]

24. When 200 or fewer PRSBs are inspected, a leak is when more than four have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 PRSBs are inspected, a leak is when more than 2.0 % (rounded up to the nearest whole number) of the PRSBs have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]

25. When 200 or fewer wells at light crude oil or gas production facilities are inspected, a leak from a pipe is when more than two or more pipes have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 wells at light crude oil or gas production facilities are inspected, a leak from a pipe is when more than 1.0 % (rounded up to the nearest whole number) of the pipes have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]

26. When pipes at natural gas processing facilities are inspected, a leak from a pipe is when more than two have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]

27. For manned facilities all accessible operating pumps, compressors, and PRDs, in service, shall be audio-visually inspected for leaks at least once every 24 hours except when operators do not report to the facility during a 24 hour period. [District Rule 4409, 5.2.1]

28. For unmanned facilities all accessible operating pumps, compressors, and PRDs, in service, shall be audio-visually inspected for leaks at least once per calendar week. [District Rule 4409, 5.2.2]

29. Any audio visual inspection of all accessible operating pumps, compressors and PRDs performed by an operator that indicate a leak that cannot be immediately repaired to meet the applicable leak standards of Rule 4409, shall be inspected not later than 24 hours after conducting the audio visual inspection. If the leak is found, the leak shall be repaired as soon as practical but not later than the time frame specified in Rule 4409. [District Rule 4409, 5.2.3]

30. Except for inaccessible components, unsafe-to-monitor components, or pipes, all components, in service, shall be tested for leaks at least once every calendar quarter. [District Rule 4409, 5.2.4]

31. All new, replaced, or repaired fittings, flanges, and threaded connections shall be tested for leaks immediately after being placed into service. [District Rule 4409, 5.2.5]

32. All inaccessible components shall be tested for leaks at least once every 12 months. [District Rule 4409, 5.2.6]

33. All unsafe-to-monitor components shall be tested for leaks during each turnaround. [District Rule 4409, 5.2.7]

34. All pipes shall be visually inspected for leaks at least once every 12 months. [District Rule 4409, 5.2.8]

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35. Any visual inspection of pipes that indicate a leak that cannot be immediately repaired to meet the applicable leak standards of Rule 4409, shall be inspected not later than 24 hours after conducting the audio visual inspection. If a leak is found, the leak shall be repaired as soon as practical but not later than the time frame specified in Rule 4409. [District Rule 4409, 5.2.8.1]

36. The annual pipe inspection required by either the Department of Oil, Gas, and Geothermal Resources (DOGGR) pursuant to California Code of Regulation Title 14, Division 2, Subchapter 2, Section 1774 (Oilfield Facilities and Equipment Maintenance), or by the Spill Prevention Control and Countermeasure Plan (SPCC) pursuant to 40 Code of Federal Regulation Part 112 (Oil Prevention and Response: Non- Transportation-Related Onshore and Offshore Facilities) can be used as the annual pipe inspection required by District Rule 4409. [District Rule 4409, 5.2.8.2]

37. Except for pumps, compressors, and PRDs, the permittee may apply for written approval from the District to change the inspection frequency of accessible components from quarterly to annually for a specific component type provided the following two qualifying requirements are met. During the previous five consecutive quarterly inspections, for the specific component type, there shall be no more leaks than as allowed by this permit. The permittee also shall not have received a Notice of Violation (NOV) from the District during the previous 12 months for violating any provisions of District Rule 4409 for the specific component type. If these two qualifying requirements have not been met, then the inspection frequency shall revert back to quarterly. The written request shall include pertinent documentation to demonstrate that the operator has successfully met the two qualifying requirements. [District Rule 4409, 5.2.9 and 5.2.10]

38. The permittee shall notify the District in writing within five calendar days after changing the inspection frequency for a specific component type. The written notification shall include the reason(s) and date of change to a quarterly inspection frequency. [District Rule 4409, 5.2.11]

39. Except as otherwise provided by District Rule 4409 for inaccessible components or unsafe to monitor components, PRDs that releases to the atmosphere shall be inspected for leaks as soon as practicable but not later than 24 hours after the time of the release. The permittee shall re-inspect the PRD for leaks not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the initial release. If the PRD is found by the permittee to be leaking during either inspection, the PRD leak shall be treated as if the leak was found during the required quarterly operator inspections. [District Rule 4409, 5.2.12]

40. Except for PRDs, a component shall be inspected for leaks not later than 15 calendar days after repairing the leak or replacing the component. [District Rule 4409, 5.2.13]

41. District inspections shall not be counted as an operator inspection required by District Rule 4409. Any attempt by an operator to count such District inspections as part of the operator's mandatory inspections is considered a willful circumvention of the rule and is a violation of this rule. [District Rule 4409, 5.2.14]

42. Upon detection of a leaking component (including those detected by audio-visual inspection), an operator shall affix to that component a weatherproof, readily visible tag, bearing the date and time when the leak was detected and the date and time of the leak measurement. For gaseous leaks, the tag shall indicate the leak concentration in ppmv. For liquid leaks, the tag shall indicate whether it is a major liquid leak or a minor liquid leak. The tag shall indicate, when applicable, whether the component is an essential component, an unsafe-to-monitor component, or a critical component. The tag shall remain in place until the leaking component is repaired or replaced and reinspected and found to be in compliance with the requirements of this rule. [District Rule 4409, 5.3.1]

43. The operator shall minimize all component leaks immediately, to the extent possible, but not later than one hour after detection of the leak in order to stop or reduce leakage to the atmosphere. If the leak has been minimized but the leak still exceeds the applicable leak standards specified in District Rule 4409, the operator shall do one of the following: 1) repair or replace the leaking component within the applicable time frame specified in District Rule 4409; 2) vent the leaking component to a closed vent system as defined by District Rule4409; 3) or remove the leaking component from operation.. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period. The start of the repair period shall be the time of the initial leak detection. [District Rule 4409, 5.3.4 and 5.3.5]

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44. The operator shall repair minor gas leaks within seven days. The operator shall repair major gas leaks, which are > 10,000 ppmv but < or equal to 50,000 ppmv, within three days. The operator shall repair major gas leaks, which are > 50,000 ppmv, within two days. The operator shall repair minor liquid leaks within three days. The operator shall repair major liquid leaks within two days. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period. The start of the repair period shall be the time of the initial leak detection. [District Rule 4409, 5.3.4 and 5.3.5]

45. For each calendar quarter, the operator may extend the repair period for a total number of leaking components, not to exceed 0.05 % of the number of components inspected, by type, rounded upward to the nearest whole number. The repair period for minor gas leaks can be extended by seven additional days. The repair period for major gas leaks, which are > 10,000 ppmv but < or equal to 50,000 ppmv, can be extended by two additional days. [District Rule 4409, 5.3.5]

46. If a leaking component is an essential component or a critical component and which cannot be shut down immediately for repairs, the operator shall do the following: 1) minimize the leak within one hour after detection of the leak; 2) and if the leak has been minimized, but the leak still exceeds the applicable leak standards of Rule 4409 as specified in this permit, the essential component or critical component shall be repaired or replaced to eliminate the leak during the next process unit turnaround. The repair shall occur no later than one year from the date of the original leak detection. [District Rule 4409, 5.3.6]

47. For any component that has incurred five repair actions for major gas leaks or major liquid leaks, or a combination of major gas leaks and major liquid leaks within a continuous 12-month period, the operator shall do one of the following four options. Options 1a through 1f require written notification to the District, option 2 requires written notification to the District and written District approval, options 3 and 4 do not require written notification to the District: 1a) For compressors replace the existing seal with either a dual mechanical seal, an oil film seal, a gas seal, or a face-type seal; 1b) for pumps replace the pump with a seal-less pump or replace the seal with a dual mechanical seal; 1c) for PRDs replace the PRD and install a rupture disc in the line which precedes the PRD such that the PRD is in series with and follows the rupture disc; 1d) for valves replace the valve with a sealed bellows valve, or for seal rings install graphite or Teflon chevron seal rings in a live-loaded packing gland; 1e) for threaded connections weld the connections or replace threaded connections with flanges; 1f) for sampling connections replace the sampling connection with a closed-loop sampling system; 2) Replace the component with Achieved-in-Practice Best Available Control Technology (BACT) equipment; 3) Vent the component to a District approved closed-vent system; 4) Remove the component from operation. For any component that is accessible, is not unsafe-to-monitor, is not an essential component, or is not a critical component, the operator shall comply with these requirements as soon as practicable but not later than twelve months after the date of detection of the fifth major leak within a continuous 12-month period. For any component that is inaccessible, is unsafe-to-monitor, is essential, or is a critical component, the operator shall comply with these requirements as soon as practicable but not later than the next turnaround or not later than two years after the date of detection of the fifth major leak within a continuous 12-month period, whichever comes first. [District Rule 4409, 5.3.7]

48. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and recordkeeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other system approved by the District that enables an operator or the District to locate each individual component. The operator shall replace physical identifications that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. [District Rule 4409, 5.4.1]

49. The operator shall keep a copy of the District approved Operator Management Plan (OMP) at the facility and make it available to the District, ARB, and EPA upon request. [District Rule 4409, 6.1.2]

50. By January 30th of each year the operator shall submit to the District for approval, in writing, an annual report indicating any changes to the existing OMP on file at the District. [District Rule 4409, 6.1.4]

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51. The operator shall maintain an inspection log that has been signed and dated by the facility operator responsible for the inspection, certifying the accuracy of the information recorded in the log. The inspection log shall contain, at a minimum, all of the following information: 1) The total number of components inspected, and the total number and percentage of leaking components found by component types; 2) The location, type, name or description of each leaking component and the description of any unit where the leaking component is found; 3) Date of the leak detection and method of the leak detection; 4) For gaseous leaks, record the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak; 5) The date of repair, replacement, or removal from operation of the leaking component(s); 6) The identification and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes first; 7) The method(s) used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier; 8) The date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced; 9) The inspector's name, business mailing address, and business telephone number. [District Rule 4409, 6.2.1]
52. Records of leaks detected during quarterly or annual operator inspections, and each subsequent repair and re-inspection, shall be submitted to the District, ARB, and EPA upon request. [District Rule 4409, 6.2.2]
53. Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components. The records shall include a copy of the current calibration gas certification from the vendor of the calibration gas cylinder, the date of calibration, the concentration of calibration gas, the instrument reading of calibration gas before adjustment, the instrument reading of calibration gas after adjustment, the calibration gas expiration date, and the calibration gas cylinder pressure at the time of calibration. [District Rule 4409, 6.2.3]
54. All records required by this permit shall be retained on-site for a minimum of five years and made available for District, ARB, and EPA inspection upon request. [District Rule 4409, 6.2.4]
55. For determining compliance with Rule 4409, all measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instructions not more than 30 days prior to its use. [District Rule 4409, 6.3.1]
56. For determining compliance with Rule 4409, the VOC content by weight percent shall be determined using ASTM D-1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 for liquids. [District Rule 4409, 6.3.2]
57. The percent by volume liquid evaporated at 302 °F (150 °C) shall be determined using ASTM D-86. [District Rule 4409, 6.3.3]
58. The TVP of any organic liquid shall be determined by measuring the Reid Vapor Pressure (RVP) using ASTM D-323, and converting the RVP to TVP at the maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance with the procedures specified in Appendix A of District Rule 4409. [District Rule 4409, 6.3.4]
59. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM D-287 or ASTM 1298. Sampling for API gravity shall be performed in accordance with ASTM D-4057. [District Rule 4409, 6.3.5]
60. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4409, 6.3.6]
61. For determining compliance with Rule 4409, halogenated exempt compounds shall be analyzed by EPA Method 18 or ARB Method 422. [District Rule 4409, 6.3.7]
62. Equipment that is in vacuum service is exempt from the control and monitoring requirements and work practice standards of District Rule 4409 and applicable NSPS requirements, provided the equipment is identified as such in the Operator Management Plan. [District Rule District Rule 4409, 4.2.8 and 40 CFR 60.482-1(d)]

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63. For determining compliance with applicable NSPS requirements, the test methods and procedures at 40 CFR 60.485 shall be used. Alternative test methods may be used subject to approval pursuant to 40 CFR 60.8. [40 CFR 60.8, 40 CFR 60.485]

64. For all components that are subject to applicable requirements of District Rule 4409 and are included in the operator management plan and that comply with the inspection, maintenance and repair requirements as specified by Rule 4409, a Title-V permit shield for applicable Rule 4409 requirements is granted. [District Rule 4409]

65. For all components that are subject to applicable NSPS requirements and are included in the permit unit addendum to the operator management plan and that comply with the applicable NSPS inspection, maintenance and repair requirements as specified by the terms and condition of this permit, a Title-V permit shield is granted for applicable requirements at 40 CFR 60, Subpart KKK. [District Rule 40 CFR 60, Subpart KKK]

66. If a vapor collection system or closed vent system is operated under a vacuum, it is exempt from the inspection requirements as specified in this permit unit. [District Rule 4409, 4.2.8 and 40 CFR 60.482-10(i)]

67. For open ended lines and open ended valves, subject to applicable NSPS, each open-ended valve or line shall be sealed with two (2) valves, a blind flange, a cap, or a plug at all times, except during operations requiring process fluid flow through the valve or line. Open ended lines and valves designed to open automatically in the event of an emergency are exempt from this requirement [40 CFR 60.482-6(a) and 40 CFR 60.482-6(d)]

68. For valves subject to applicable new source performance standards (NSPS), any valve in gas/vapor service or light liquid service that is designated in the Operator Management Plan as an unsafe-to-monitor valve is exempt from the monthly NSPS leak inspection requirements, provided: 1) the owner/operator demonstrates the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence, and 2) a written plan is adhered to that requires monitoring of the valve as frequently as practicable during safe-to-monitor times and at least annually and during shutdown. [40 CFR 60.482-7(g)]

69. For valves subject to applicable NSPS, any valve in gas/vapor service or light liquid service that is designated in the Operator Management Plan as a difficult-to-monitor (inaccessible) valve is exempt from the monthly NSPS leak inspection requirements, provided: 1) the owner/operator demonstrates the valve cannot be monitored without elevating the monitoring personnel more than 15 feet above a support surface, or that it is over 6 feet away from a platform , 2) the process unit within which the valve is located either becomes an affected facility through 40 CFR 60.14 or 60.15 or if the owner/operator designates less than 3.0% of the total number of valves as difficult-to-monitor, and 3) a written plan is adhered to that, requires monitoring of the valve at least annually and during shutdown. [40 CFR 60.482-7(h)]

70. Any components of the closed vent system that are designated as unsafe to inspect are exempt from the inspection requirements specified in this permit unit if the owner or operator complies with the following: 1) the owner or operator determines that the equipment is unsafe to inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying with the inspection requirements; 2) the owner or operator identifies the components in the Operator Management Plan; 3) the owner or operator has a written plan that requires inspection of the equipment as frequently as practicable during safe-to-inspect times; and 4) inspection and required repair of the components is performed at least annually and during shutdown. [District Rule 4409, 5.3.7.5 and 40 CFR 60.482-10(j)]

71. For components subject to applicable NSPS, when a leak is detected, a weatherproof and readily visible tag shall be attached, bearing the equipment identification number and date which the leak is detected. The tag on a valve shall remain in place until after it has been monitored for 2 successive months and no leak has been detected. The tag on all other equipment may be removed after repair and re-inspection document compliance with the applicable NSPS. [40 CFR 60.486(b) and 60.635(b)(1)]

72. Any leak detected on the basis of sight, smell, or sound shall be identified by the operator affixing a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until repair and reinspection document compliance, whether or not operator inspection is otherwise required by this permit. [District Rule 4409, 5.3.3 and5.3.3]

73. Any leaking component and any leak shall be repaired to a leak-free condition and reinspected within 15 calendar days. [40 CFR 60.482-7]

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74. For components subject to applicable NSPS standards, except as otherwise provided by 40 CFR 60.482-9, any component leak shall be repaired to a leak-free condition, or vented to a flare satisfying the requirements of 40 CFR 60.18, or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 or EPA Method 18 within fifteen (15) calendar days of detection. A first attempt at repair shall be made no later than 5 calendar days after leak detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates necessary and sufficient actions are being taken to correct the leak within this time period. [40 CFR 60.482-2(c)(1) and (c)(2), 60.482-3(g), 60.482-7(d), 60.482-8(c), and 60.633(b)(3)]

75. For components subject to applicable NSPS, if the leaking component is an essential part of a critical process identified in the operator management plan and which cannot be immediately shut down for repairs, the operator shall minimize the leak within 15 calendar days. If the leak which has been minimized still exceeds the applicable NSPS standard, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than six months from the date of the original leak detection for pumps and one year from the date of the original leak detection for other components. Delay of repair is allowed for equipment which is isolated from the process and which does not remain in VOC service and delay of repair is is allowed pursuant to 40 CFR 60.482-2(c)(1), 40 CFR 60.482-3(g)(1), 40 CFR 60.482-4(b)(1), 40 CFR 60.482-7(d)(1),40 CFR 60.482-8(c)(1) [40 CFR 60.482- 2(c)(1). [40 CFR 40 CFR 60.482-3(g)(1), 40 CFR 60.482-4(b)(1), 40 CFR 60.482-7(d)(1),40 CFR 60.482-8(c)(1), 60.482-9(a) and (b)]

76. Delay of repair of a closed vent system for which leaks have been detected is allowed if the closed vent system is an essential part of a critical process identified in the operator management plan which cannot be immediately shut down for repairs or if the owner or operator determines that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair. However the operator shall minimize the leak within 15 calendar days. If the leak which has been minimized still exceeds the limit in this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. [40 CFR 60.482-9]

77. For the purpose of determining compliance with District Rule 4409, the operator shall maintain an inspection log that has been signed and dated by the facility operator responsible for the inspection, certifying the accuracy of the information recorded in the log. The inspection log shall contain all of the following information: 1) The total number of components inspected, and the total number and percentage of leaking components found by component types; 2) The location, type, name or description of each leaking component and the description of any unit where the leaking component is found; 3) Date of the leak detection and method of the leak detection; 4) For gaseous leaks, record the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak; 5) The date of repair, replacement, or removal from operation of the leaking component(s); 6) The identification and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes first; 7) The method(s) used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier; 8) The date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced; 9) The inspector's name, business mailing address, and business telephone number. [District Rule 4409, 6.2.1]

78. For the purpose of determining compliance with applicable NSPS, each operator shall maintain an inspection log for the components subject to NSPS inspection requirements that contains the following information: 1) instrument, operator, and equipment identification numbers; 2) date of leak detection; 3) dates and repair method of each attempt to repair the leak; 4) "above 10,000" if the maximum instrument reading after each repair attempt is equal to or greater than 10,000 ppm; 5) "repair delayed", reason for delay, signature of individual whose decision it was that repair could not be effected without a process shutdown, and expected date of successful repair if a leak is not repaired within 15 days of detection; 6) dates of process unit shutdown that occur while the equipment is unrepaired; 7) date of successful repair and emission level of recheck after leak is repaired. [District Rule 40 CFR 60.486(c) and 60.635(2)(i) through (ix)]

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79. Each piece of equipment subject to requirements of this permit is presumed to be in VOC service or in wet gas service unless an owner or operator demonstrates that the piece of equipment is not in VOC service or in wet gas service. For a piece of equipment to be considered not in VOC service, it must be determined that the VOC content can be reasonably expected never to exceed 10.0 percent by weight. For a piece of equipment to be considered in wet gas service, it must be determined that it contains or contacts the field gas before the extraction step in the process. For purposes of determining the percent VOC content of the process fluid that is contained in or contacts a piece of equipment, procedures that conform to the methods described this permit shall be used. [40 CFR 60.485(d) and 60.632(f)]

80. Compliance the no detectable emission standards for this permit unit shall be determined as follows: 1) EPA Method 21 shall be followed, 2) Method 21 shall be used to determine the background level and all potential leak interfaces shall be traversed as close to the inter face as possible, and 3) the arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 500 ppm to determine compliance. [40 CFR 60.485(c)]

81. For valves subject to applicable NSPS, if the operator elects to comply with the allowable percentage of leaking valves then for this permit unit, the operator shall notify the APCO 90 days before implementing these alternatives. [40 CFR 60.483-1(b)(1) and (d), 60. 483-2(a)(2), and 60.487(d)]

82. For valves subject to applicable NSPS, if the allowable percentage of leaking valves is selected, then a performance test shall be conducted initially upon designation for allowable percentage of leaking valves, annually, and at other times requested by the APCO. The performance test shall be conducted as follows: 1) all valves in gas/vapor and light liquid service shall be monitored within 1 week using EPA Method 21 and 2) the leak percentage shall be determined by dividing the number of leaking valves detected and valves for which repair has been delayed by the number of valves in gas/vapor and light liquid service in this permit unit, 3) a record must be kept of the percent of valves found leaking during each leak detection period. [40 CFR 60.483-1(b)(2) and (c) and 60. 483-2(b)(5) and (6)]

83. For compressors subject to applicable NSPS, each compressor shall meet the applicable control system requirements of 40 CFR 482-3(a) - (i), except as otherwise provided by 40 CFR 60.482-1(c) and 40 CFR 60.482-3(h) and (i). [40 CFR 60.482-3(a) through (j)], 40 CFR 60.482-1(c), 40 CFR 60.482-3(h) and (i), and 40 CFR 60.633]

84. Compressors that are subject to applicable NSPS, are exempt from requirements of 40 CFR 60.482-3(a) and 40 CFR 60.482-3(b) if the compressor is equipped with a closed vent system to capture and transport leakage from the compressor drive shaft back to a process fuel gas system or a control device. Closed vent systems piping shall comply with applicable requirements at 40 CFR 60.482-10. Closed vent vapor recovery systems shall comply with design requirements at 40 CFR 60.482-10(b). Enclosed combustion devices used by closed vent system shall comply with design requirements at 40 CFR 60.482-10(c). Flares used by closed vent systems shall comply with requirements at 40 CFR 60.482-10(d). Closed vent system control devices shall comply with monitoring requirements at 40 CFR 60.482-10(e). [40 CFR 60 .482-3, 40 CFR 60.482-10]

85. Compressors that are subject to applicable NSPS and are designated in the Operator Management Plan for no detectable leak emission, as indicated by an instrument reading of less than 500 ppm above background, is are exempt from the requirements of 40 CFR 482-3(a)-(h), provided the compressor is tested for compliance with no detectable emissions initially upon designation, annually, and at other times requested by the APCO. [40 CFR 60.482-3(i)]

86. When determining compliance with applicable NSPS, if an instrument reading of 10,000 ppm or greater is measured, a leak is detected. [40 CFR 60.633(b)(2), 40482-7(a), (b), and (c]

87. For open ended lines or valves subject to applicable NSPS, each open-ended valve or line equipped with a second valve shall be operated so that the valve on the process fluid end is closed before the second valve is closed. [40 CFR 60.482-6(b)]

88. For equipment subject to applicable NSPS when a double block-and-bleed system is being used, the bleed valve or line may remain open only during operations that require venting the line between the block valves. [40 CFR 60.482-6(c)]

89. Except as provided by applicable NSPS, valves that are subject to NSPS that are in gas/vapor service or light liquid service shall be monitored monthly to detect leaks using EPA Method 21. Any valve for which a leak is not detected for 2 successive months may be monitored the first month of every quarter. If a leak is subsequently detected, monitoring shall revert to monthly. [40 CFR 60.482-7(a), (b), and (c)]

CONDITIONS CONTINUE ON NEXT PAGE

90. Any valve in gas/vapor service or light liquid service that is designated in the equipment log list for no detectable leak emission, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the monitoring requirements of 40 CFR 60.482-7(a), provided the valve: 1) has no external actuating mechanism in contact with the process fluid and 2) is tested for and meets compliance with no detectable leak emission initially upon designation, annually and at other times requested by the APCO. [40 CFR 60.482-7(f)]

91. For valves subject to applicable NSPS requirements, for a valve in gas/vapor service or light or heavy liquid service, first attempts at repair shall include the following where practicable: 1) tightening of bonnet bolts, 2) replacement of bonnet bolts, 3) tightening of packing gland nuts, and 4) injection of lubricant into lubricant packing. [40 CFR 60.482-7(e) and 60.482-8(d)]

92. For pumps and valves in heavy liquid service, pressure relief devices in light or heavy liquid service, and flanges and other connectors, that are subject to applicable NSPS requirements, if evidence of a potential leak is found by sight, sound, smell, or any other detection method then the device shall be monitored within 5 days for leak detection in accordance with EPA Method 21. A leak is detected if an instrument reading of 10,000 ppm or greater is measured. [40 CFR 60.482-8(a) and (b)]

93. In addition to the information required by Rule 4409, the operator management plan shall include an addendum for this permit unit containing the following applicable NSPS information: 1) list of identification numbers for equipment subject to the applicable NSPS requirements, 2) list of identification numbers for equipment which is designated for no detectable emissions and which is signed by the owner/operator, 3) list of equipment identification numbers for pressure relief devices which must be operated with no detectable emissions, 4) dates of each compliance test for emissions below 500 ppm, for all equipment subject to this no detectable emission limit and the background level measured and the maximum instrument reading measured at the equipment, during each test, and 5) list of identification numbers for equipment in vacuum service. [40 CFR 60.486(e) and 60.635(b)(2)(x)]

94. In addition to the information required by Rule 4409, the operator management plan shall include an addendum for this permit unit containing the following applicable NSPS information: for valves in gas/vapor service and light liquid service: 1) a list of identification numbers for valves designated "unsafe-to-monitor" and for valves designated "difficult-to monitor", 2) an explanation for each valve stating why it is so designated, and 3) the schedule for monitoring each such valve. [40 CFR 60.486(f)]

95. For valves subject to NSPS annual leak detection alternative requirements, the NSPS inspection log shall include the following information: 1) a schedule of monitoring and 2) the percent of valves found leaking during each monitoring period. [CFR 60.486(g)]

96. A log containing the following information for pumps and compressors equipped a barrier fluid seal system which includes a seal failure sensor, for which a system failure criteria is required to be established, pursuant to the requirements for this permit unit, shall be maintained and kept in a readily accessible location: 1) the design criterion required by this permit and an explanation and 2) any changes to this criterion and reasons for the changes. [40 CFR 60.486(h)]

97. For equipment (compressors and components) subject to applicable NSPS, the operator shall maintain information and data used to demonstrate that a piece of equipment is not in VOC service and information and data used to demonstrate that a reciprocating compressor is in wet gas service. The information shall be included in the NSPS inspection log for the permit unit and shall be kept in a readily accessible location. [40 CFR 60.486(j) and 60.635(c)]

98. Vapor recovery systems (for example, condensers and absorbers) shall be designed and operated to recover the VOC emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 parts per million by volume, whichever is less stringent. [40 CFR 60.482-10(b)]

99. Enclosed combustion devices shall be designed and operated to reduce the VOC emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 parts per million by volume, on a dry basis, corrected to 3 percent oxygen, whichever is less stringent or to provide a minimum residence time of 0.75 seconds at a minimum temperature of 816 °C. [40 CFR 60.482-10(c)]

100. If the vapor collection system or closed vent system is constructed of hard-piping, the owner or operator shall conduct an initial inspection according to the procedures specified in EPA Method 21 using the calibration gases as specified in the requirements for this permit unit. The owner or operator shall also conduct annual visual inspections for visible, audible, or olfactory indications of leaks. [40 CFR 60.482-10(f)(1) and 40 CFR 60.485(b)]

CONDITIONS CONTINUE ON NEXT PAGE

101. If the vapor collection system or closed vent system is constructed of ductwork, the owner or operator shall conduct an initial inspection and annual inspections according to the procedures specified in EPA Method 21 using the calibration gases as specified in the requirements for this permit unit. The owner or operator shall also conduct annual visual inspections for visible, audible, or olfactory indications of leaks. [40 CFR 60.482-10(f)(2) and 40 CFR 60.485(b)]

102. Any parts of the closed vent system that are designated as difficult to inspect are exempt from the inspection requirements of 40 CFR 60.482-10(f)(1) and (f)(2) if the owner or operator complies with the following: 1) the owner or operator determines that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters above a support surface; and 2) the process unit within which the closed vent system is located becomes an affected facility through modification or reconstruction, as defined in 40 CFR 60.14 and 60.15, or the owner or operator designates less than 3.0 percent of the total number of closed vent system equipment as difficult to inspect; and 3) the owner or operator has a written plan that requires inspection of the equipment at least every 5 years. A closed vent system is exempt from inspection if it is operated under a vacuum. [40 CFR 60.482-10(k)]

103. Closed vent systems and control devices shall be operated at all times when emissions may be vented to them. [40 CFR 60.482-10(m)]

104. A log shall be maintained containing the following information: 1) identification of all parts of the closed vent system that are designated as unsafe to inspect, an explanation of why the equipment is unsafe to inspect, and the plan for inspecting the equipment; 2) identification of all parts of the closed vent system that are designated as difficult to inspect, an explanation of why the equipment is difficult to inspect, and the plan for inspecting the equipment; 3) for each inspection conducted in accordance with EPA Method 21 during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected; and 4) for each visual inspection conducted for visible, audible, or olfactory indications of leaks during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected. [40 CFR 60.482-10(l) and 40 CFR 60.485(b)]

105. For components subject to applicable NSPS requirements, semiannual reports shall be submitted to the APCO containing the following information: 1) process unit identification, 2) for each month during the reporting period, number of valves, pumps, compressors, and pressure relief devices for which leaks were detected; number of valves, pumps, compressors, and pressure relief devices for which leaks were not repaired within 15 days and a first attempt not made within 5 days of leak detection; the facts that explain each delay of repair and, where appropriate, why a process unit shutdown was technically infeasible 3) dates of process unit shutdowns which occurred within the reporting period, and 4) revisions to items reported in the initial or subsequent semiannual reports. [40 CFR 60.487(a) and (c) and 60.636(c)]

106. All logs required for this permit unit and all records of required monitoring data and support information shall be retained by the operator for a minimum of five years after the date of an entry, kept in a readily accessible location, and made available upon request to District personnel. [District Rules 2520, 9.4.2 and 4403, 6.2.3]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-2234-180-0 **EXPIRATION DATE:** 10/31/2009

EQUIPMENT DESCRIPTION:
ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-19) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE

PERMIT UNIT REQUIREMENTS

1. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
2. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
3. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
4. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation at another stationary source without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]
5. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]
6. Fugitive VOC emissions from compressor skid shall be less than 0.55 lb/ day. [District Rule 2201]
7. VOC content of the total hydrocarbons in the gas stream handled shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
8. VOC content of the total hydrocarbons in the gas stream handled shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
9. VOC content shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
10. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
11. The permittee shall not use any components that leak in excess of the applicable leak standards as specified in District Rule 4409. Components that have been found leaking in excess of the applicable leak standards of Rule 4409 may be used provided such leaking components have been identified with a tag for repair, are repaired, or are awaiting re-inspection after being repaired, within the applicable time period specified in Rule 4409. [District Rule 4409, 5.1.1]
12. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch or during attended repair replacement or maintenance operations provided such activities are done as expeditiously as possible and with minimal spillage of material an VOC emissions to the atmosphere. [District Rule 4409, 5.1.2]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

13. For valves, threaded connections, flanges, pipes, pumps, compressors, and other components not specified in this permit; a major gas leak is a detection of > 10,000 ppmv as methane; a minor gas leak is a detection of 1,000 to 10,000 ppmv as methane when the component is in liquid service; a minor gas leak is a detection of 2,000 to 10,000 ppmv as methane when the component is in gas/vapor service. [District Rule 4409, 5.1.1]

14. For pressure relief devices (PRDs); a major gas leak is a detection of > 10,000 ppmv as methane; a minor gas leak is a detection of 200 to 10,000 ppmv as methane when the component is in liquid service; a minor gas leak is a detection of 400 to 10,000 ppmv as methane when the component is in gas/vapor service. [District Rule 4409, 5.1.1]

15. Minor gas leaks from PRSBs detected during any District inspection shall not be counted toward determination of compliance with this rule provided the permittee repairs, replaces, or removes leaking PRSBs from VOC service as soon as practicable but not later than seven calendar days. [District Rule 4409, 5.1.3.1.2]

16. Leaks detected during quarterly operator inspections shall not be counted towards determination of compliance with the provisions of Rule 4409 provided the leaking components are repaired as soon as practicable but not later than the time frame specified in this permit. Leaks detected during quarterly operator inspections that are not repaired, replaced, or removed from operation as soon as practicable but not later than the time frame specified in this rule shall be counted toward determination of compliance with the provisions of Rule 4409. [District Rule 4409, 5.1.3.2.1 and 5.1.3.2.2]

17. Leaking components at this facility detected during annual operator inspections, as required by Rule 4409 for a specific component type, that exceed the leak standards specified in this permit, shall constitute a violation of this rule. This violation is regardless of whether or not the leaking components are repaired, replaced, or removed from operation within the allowable repair time frame specified in this permit. [District Rule 4409, 5.1.3.2.3]

18. An open-ended line, or a valve located at the end of the line, that is not sealed with either a blind flange, a plug, a cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended line is a leak. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4409, 5.1.4.1]

19. A leak from a component handling liquids is when there is a major liquid leak from the component. A major liquid leak from a component is when a visible mist or a continuous flow of liquid, that is not seal lubricant, leaks from the component. [District Rule 4409, 5.1.4.2]

20. A leak from a component handling gas is when gas emissions greater than 50,000 ppmv, as methane, leaks from the component. [District Rule 4409, 5.1.4.3]

21. A minor liquid leak from a component is when more than three drops of liquid per minute, that is not seal lubricant and is not a major liquid leak, leaks from the component. [District Rule 4409, 5.1.4.4]

22. When 200 or fewer valves are inspected, a leak from a valve is when more than one valve has a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 valves are inspected, a leak from a valve is when more than 0.5 % (rounded up to the nearest whole number) of the valves have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]

23. When 200 or fewer threaded connections are inspected, a leak from a threaded connection is when more than one threaded connection has a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 threaded connections are inspected, a leak from a threaded connection is when more than 0.5 % (rounded up to the nearest whole number) of the threaded connections have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]

24. When 200 or fewer flanges are inspected, a leak from a flange is when more than one flange has a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 flanges are inspected, a leak from a flange is when more than 0.5 % (rounded up to the nearest whole number) of the flanges have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

25. When 200 or fewer pumps are inspected, a leak from a pump is when more than two pumps have a minor liquid leak, a minor gas leak, or a gas leak greater than 10,000 ppmv and less than or equal to 50,000 ppmv. When greater than 200 pumps are inspected, a leak from a pump is when more than 1.0 % (rounded up to the nearest whole number) of the pumps have a minor liquid leak, a minor gas leak, or a gas leak greater than 10,000 ppmv and less than or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]
26. When compressors, PRDs, or other components not specified in this permit are inspected, a leak from these components is when more than one component has a minor liquid leak, a minor gas leak, or a gas leak greater than 10,000 ppmv and less than or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]
27. When 200 or fewer PRSBs are inspected, a leak is when more than four have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 PRSBs are inspected, a leak is when more than 2.0 % (rounded up to the nearest whole number) of the PRSBs have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]
28. When 200 or fewer wells at light crude oil or gas production facilities are inspected, a leak from a pipe is when more than two or more pipes have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 wells at light crude oil or gas production facilities are inspected, a leak from a pipe is when more than 1.0 % (rounded up to the nearest whole number) of the pipes have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]
29. When pipes at natural gas processing facilities are inspected, a leak from a pipe is when more than two have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]
30. For manned facilities all accessible operating pumps, compressors, and PRDs, in service, shall be audio-visually inspected for leaks at least once every 24 hours except when operators do not report to the facility during a 24 hour period. [District Rule 4409, 5.2.1]
31. For unmanned facilities all accessible operating pumps, compressors, and PRDs, in service, shall be audio-visually inspected for leaks at least once per calendar week. [District Rule 4409, 5.2.2]
32. Any audio visual inspection of all accessible operating pumps, compressors and PRDs performed by an operator that indicate a leak that cannot be immediately repaired to meet the applicable leak standards of Rule 4409, shall be inspected not later than 24 hours after conducting the audio visual inspection. If the leak is found, the leak shall be repaired as soon as practical but not later than the time frame specified in Rule 4409. [District Rule 4409, 5.2.3]
33. Except for inaccessible components, unsafe-to-monitor components, or pipes, all components, in service, shall be tested for leaks at least once every calendar quarter. [District Rule 4409, 5.2.4]
34. All new, replaced, or repaired fittings, flanges, and threaded connections shall be tested for leaks immediately after being placed into service. [District Rule 4409, 5.2.5]
35. All inaccessible components shall be tested for leaks at least once every 12 months. [District Rule 4409, 5.2.6]
36. All unsafe-to-monitor components shall be tested for leaks during each turnaround. [District Rule 4409, 5.2.7]
37. All pipes shall be visually inspected for leaks at least once every 12 months. [District Rule 4409, 5.2.8]
38. Any visual inspection of pipes that indicate a leak that cannot be immediately repaired to meet the applicable leak standards of Rule 4409, shall be inspected not later than 24 hours after conducting the audio visual inspection. If a leak is found, the leak shall be repaired as soon as practical but not later than the time frame specified in Rule 4409. [District Rule 4409, 5.2.8.1]
39. The annual pipe inspection required by either the Department of Oil, Gas, and Geothermal Resources (DOGGR) pursuant to California Code of Regulation Title 14, Division 2, Subchapter 2, Section 1774 (Oilfield Facilities and Equipment Maintenance), or by the Spill Prevention Control and Countermeasure Plan (SPCC) pursuant to 40 Code of Federal Regulation Part 112 (Oil Prevention and Response: Non- Transportation-Related Onshore and Offshore Facilities) can be used as the annual pipe inspection required by District Rule 4409. [District Rule 4409, 5.2.8.2]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

40. Except for pumps, compressors, and PRDs, the permittee may apply for written approval from the District to change the inspection frequency of accessible components from quarterly to annually for a specific component type provided the following two qualifying requirements are met. During the previous five consecutive quarterly inspections, for the specific component type, there shall be no more leaks than as allowed by this permit. The permittee also shall not have received a Notice of Violation (NOV) from the District during the previous 12 months for violating any provisions of District Rule 4409 for the specific component type. If these two qualifying requirements have not been met, then the inspection frequency shall revert back to quarterly. The written request shall include pertinent documentation to demonstrate that the operator has successfully met the two qualifying requirements. [District Rule 4409, 5.2.9 and 5.2.10]

41. The permittee shall notify the District in writing within five calendar days after changing the inspection frequency for a specific component type. The written notification shall include the reason(s) and date of change to a quarterly inspection frequency. [District Rule 4409, 5.2.11]

42. Except as otherwise provided by District Rule 4409 for inaccessible components or unsafe to monitor components, PRDs that releases to the atmosphere shall be inspected for leaks as soon as practicable but not later than 24 hours after the time of the release. The permittee shall re-inspect the PRD for leaks not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the initial release. If the PRD is found by the permittee to be leaking during either inspection, the PRD leak shall be treated as if the leak was found during the required quarterly operator inspections. [District Rule 4409, 5.2.12]

43. Except for PRDs, a component shall be inspected for leaks not later than 15 calendar days after repairing the leak or replacing the component. [District Rule 4409, 5.2.13]

44. District inspections shall not be counted as an operator inspection required by District Rule 4409. Any attempt by an operator to count such District inspections as part of the operator's mandatory inspections is considered a willful circumvention of the rule and is a violation of this rule. [District Rule 4409, 5.2.14]

45. Upon detection of a leaking component (including those detected by audio-visual inspection), an operator shall affix to that component a weatherproof, readily visible tag, bearing the date and time when the leak was detected and the date and time of the leak measurement. For gaseous leaks, the tag shall indicate the leak concentration in ppmv. For liquid leaks, the tag shall indicate whether it is a major liquid leak or a minor liquid leak. The tag shall indicate, when applicable, whether the component is an essential component, an unsafe-to-monitor component, or a critical component. The tag shall remain in place until the leaking component is repaired or replaced and reinspected and found to be in compliance with the requirements of this rule. [District Rule 4409, 5.3.1]

46. The operator shall minimize all component leaks immediately, to the extent possible, but not later than one hour after detection of the leak in order to stop or reduce leakage to the atmosphere. If the leak has been minimized but the leak still exceeds the applicable leak standards specified in District Rule 4409, the operator shall do one of the following: 1) repair or replace the leaking component within the applicable time frame specified in District Rule 4409; 2) vent the leaking component to a closed vent system as defined by District Rule4409; 3) or remove the leaking component from operation.. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period. The start of the repair period shall be the time of the initial leak detection. [District Rule 4409, 5.3.4 and 5.3.5]

47. The operator shall repair minor gas leaks within seven days. The operator shall repair major gas leaks, which are > 10,000 ppmv but < or equal to 50,000 ppmv, within three days. The operator shall repair major gas leaks, which are > 50,000 ppmv, within two days. The operator shall repair minor liquid leaks within three days. The operator shall repair major liquid leaks within two days. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period. The start of the repair period shall be the time of the initial leak detection. [District Rule 4409, 5.3.4 and 5.3.5]

48. For each calendar quarter, the operator may extend the repair period for a total number of leaking components, not to exceed 0.05 % of the number of components inspected, by type, rounded upward to the nearest whole number. The repair period for minor gas leaks can be extended by seven additional days. The repair period for major gas leaks, which are > 10,000 ppmv but < or equal to 50,000 ppmv, can be extended by two additional days. [District Rule 4409, 5.3.5]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

49. If a leaking component is an essential component or a critical component and which cannot be shut down immediately for repairs, the operator shall do the following: 1) minimize the leak within one hour after detection of the leak; 2) and if the leak has been minimized, but the leak still exceeds the applicable leak standards of Rule 4409 as specified in this permit, the essential component or critical component shall be repaired or replaced to eliminate the leak during the next process unit turnaround. The repair shall occur no later than one year from the date of the original leak detection. [District Rule 4409, 5.3.6]

50. For any component that has incurred five repair actions for major gas leaks or major liquid leaks, or a combination of major gas leaks and major liquid leaks within a continuous 12-month period, the operator shall do one of the following four options. Options 1a through 1f require written notification to the District, option 2 requires written notification to the District and written District approval, options 3 and 4 do not require written notification to the District: 1a) For compressors replace the existing seal with either a dual mechanical seal, an oil film seal, a gas seal, or a face-type seal; 1b) for pumps replace the pump with a seal-less pump or replace the seal with a dual mechanical seal; 1c) for PRDs replace the PRD and install a rupture disc in the line which precedes the PRD such that the PRD is in series with and follows the rupture disc; 1d) for valves replace the valve with a sealed bellows valve, or for seal rings install graphite or Teflon chevron seal rings in a live-loaded packing gland; 1e) for threaded connections weld the connections or replace threaded connections with flanges; 1f) for sampling connections replace the sampling connection with a closed-loop sampling system; 2) Replace the component with Achieved-in-Practice Best Available Control Technology (BACT) equipment; 3) Vent the component to a District approved closed-vent system; 4) Remove the component from operation. For any component that is accessible, is not unsafe-to-monitor, is not an essential component, or is not a critical component, the operator shall comply with these requirements as soon as practicable but not later than twelve months after the date of detection of the fifth major leak within a continuous 12-month period. For any component that is inaccessible, is unsafe-to-monitor, is essential, or is a critical component, the operator shall comply with these requirements as soon as practicable but not later than the next turnaround or not later than two years after the date of detection of the fifth major leak within a continuous 12-month period, whichever comes first. [District Rule 4409, 5.3.7]

51. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and recordkeeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other system approved by the District that enables an operator or the District to locate each individual component. The operator shall replace physical identifications that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. [District Rule 4409, 5.4.1]

52. The operator shall keep a copy of the District approved Operator Management Plan (OMP) at the facility and make it available to the District, ARB, and EPA upon request. [District Rule 4409, 6.1.2]

53. By January 30th of each year the operator shall submit to the District for approval, in writing, an annual report indicating any changes to the existing OMP on file at the District. [District Rule 4409, 6.1.4]

54. The operator shall maintain an inspection log that has been signed and dated by the facility operator responsible for the inspection, certifying the accuracy of the information recorded in the log. The inspection log shall contain, at a minimum, all of the following information: 1) The total number of components inspected, and the total number and percentage of leaking components found by component types; 2) The location, type, name or description of each leaking component and the description of any unit where the leaking component is found; 3) Date of the leak detection and method of the leak detection; 4) For gaseous leaks, record the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak; 5) The date of repair, replacement, or removal from operation of the leaking component(s); 6) The identification and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes first; 7) The method(s) used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier; 8) The date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced; 9) The inspector's name, business mailing address, and business telephone number. [District Rule 4409, 6.2.1]

55. Records of leaks detected during quarterly or annual operator inspections, and each subsequent repair and re-inspection, shall be submitted to the District, ARB, and EPA upon request. [District Rule 4409, 6.2.2]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

56. Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components. The records shall include a copy of the current calibration gas certification from the vendor of the calibration gas cylinder, the date of calibration, the concentration of calibration gas, the instrument reading of calibration gas before adjustment, the instrument reading of calibration gas after adjustment, the calibration gas expiration date, and the calibration gas cylinder pressure at the time of calibration. [District Rule 4409, 6.2.3]

57. All records required by this permit shall be retained on-site for a minimum of five years and made available for District, ARB, and EPA inspection upon request. [District Rule 4409, 6.2.4]

58. For determining compliance with Rule 4409, all measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instructions not more than 30 days prior to its use. [District Rule 4409, 6.3.1]

59. For determining compliance with Rule 4409, the VOC content by weight percent shall be determined using ASTM D-1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 for liquids. [District Rule 4409, 6.3.2]

60. The percent by volume liquid evaporated at 302 °F (150 °C) shall be determined using ASTM D-86. [District Rule 4409, 6.3.3]

61. The TVP of any organic liquid shall be determined by measuring the Reid Vapor Pressure (RVP) using ASTM D-323, and converting the RVP to TVP at the maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance with the procedures specified in Appendix A of District Rule 4409. [District Rule 4409, 6.3.4]

62. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM D-287 or ASTM 1298. Sampling for API gravity shall be performed in accordance with ASTM D-4057. [District Rule 4409, 6.3.5]

63. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4409, 6.3.6]

64. For determining compliance with Rule 4409, halogenated exempt compounds shall be analyzed by EPA Method 18 or ARB Method 422. [District Rule 4409, 6.3.7]

65. Equipment that is in vacuum service is exempt from the control and monitoring requirements and work practice standards of District Rule 4409 provided the equipment is identified as such in the Operator Management Plan. [District Rule 4409]

66. For all components that are subject to applicable requirements of District Rule 4409 and are included in the operator management plan and that comply with the inspection, maintenance and repair requirements as specified by Rule 4409, a Title-V permit shield for applicable Rule 4409 requirements is granted. [District Rule 4409]

67. All logs required for this permit unit and all records of required monitoring data and support information shall be retained by the operator for a minimum of five years after the date of an entry, kept in a readily accessible location, and made available upon request to District personnel. [District Rules 2520, 9.4.2 and 4409, 6.2.3]

68. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-2234-181-0 **EXPIRATION DATE:** 10/31/2009

EQUIPMENT DESCRIPTION:
ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-20) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE

PERMIT UNIT REQUIREMENTS

1. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
2. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
3. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
4. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation at another stationary source without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]
5. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]
6. Fugitive VOC emissions from compressor skid shall be less than 0.55 lb/ day. [District Rule 2201]
7. VOC content of the total hydrocarbons in the gas stream handled shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
8. VOC content of the total hydrocarbons in the gas stream handled shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
9. VOC content shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
10. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
11. The permittee shall not use any components that leak in excess of the applicable leak standards as specified in District Rule 4409. Components that have been found leaking in excess of the applicable leak standards of Rule 4409 may be used provided such leaking components have been identified with a tag for repair, are repaired, or are awaiting re-inspection after being repaired, within the applicable time period specified in Rule 4409. [District Rule 4409, 5.1.1]
12. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch or during attended repair replacement or maintenance operations provided such activities are done as expeditiously as possible and with minimal spillage of material an VOC emissions to the atmosphere. [District Rule 4409, 5.1.2]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

13. For valves, threaded connections, flanges, pipes, pumps, compressors, and other components not specified in this permit; a major gas leak is a detection of > 10,000 ppmv as methane; a minor gas leak is a detection of 1,000 to 10,000 ppmv as methane when the component is in liquid service; a minor gas leak is a detection of 2,000 to 10,000 ppmv as methane when the component is in gas/vapor service. [District Rule 4409, 5.1.1]
14. For pressure relief devices (PRDs); a major gas leak is a detection of > 10,000 ppmv as methane; a minor gas leak is a detection of 200 to 10,000 ppmv as methane when the component is in liquid service; a minor gas leak is a detection of 400 to 10,000 ppmv as methane when the component is in gas/vapor service. [District Rule 4409, 5.1.1]
15. Minor gas leaks from PRSBs detected during any District inspection shall not be counted toward determination of compliance with this rule provided the permittee repairs, replaces, or removes leaking PRSBs from VOC service as soon as practicable but not later than seven calendar days. [District Rule 4409, 5.1.3.1.2]
16. Leaks detected during quarterly operator inspections shall not be counted towards determination of compliance with the provisions of Rule 4409 provided the leaking components are repaired as soon as practicable but not later than the time frame specified in this permit. Leaks detected during quarterly operator inspections that are not repaired, replaced, or removed from operation as soon as practicable but not later than the time frame specified in this rule shall be counted toward determination of compliance with the provisions of Rule 4409. [District Rule 4409, 5.1.3.2.1 and 5.1.3.2.2]
17. Leaking components at this facility detected during annual operator inspections, as required by Rule 4409 for a specific component type, that exceed the leak standards specified in this permit, shall constitute a violation of this rule. This violation is regardless of whether or not the leaking components are repaired, replaced, or removed from operation within the allowable repair time frame specified in this permit. [District Rule 4409, 5.1.3.2.3]
18. An open-ended line, or a valve located at the end of the line, that is not sealed with either a blind flange, a plug, a cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended line is a leak. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4409, 5.1.4.1]
19. A leak from a component handling liquids is when there is a major liquid leak from the component. A major liquid leak from a component is when a visible mist or a continuous flow of liquid, that is not seal lubricant, leaks from the component. [District Rule 4409, 5.1.4.2]
20. A leak from a component handling gas is when gas emissions greater than 50,000 ppmv, as methane, leaks from the component. [District Rule 4409, 5.1.4.3]
21. A minor liquid leak from a component is when more than three drops of liquid per minute, that is not seal lubricant and is not a major liquid leak, leaks from the component. [District Rule 4409, 5.1.4.4]
22. When 200 or fewer valves are inspected, a leak from a valve is when more than one valve has a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 valves are inspected, a leak from a valve is when more than 0.5 % (rounded up to the nearest whole number) of the valves have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]
23. When 200 or fewer threaded connections are inspected, a leak from a threaded connection is when more than one threaded connection has a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 threaded connections are inspected, a leak from a threaded connection is when more than 0.5 % (rounded up to the nearest whole number) of the threaded connections have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]
24. When 200 or fewer flanges are inspected, a leak from a flange is when more than one flange has a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 flanges are inspected, a leak from a flange is when more than 0.5 % (rounded up to the nearest whole number) of the flanges have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

25. When 200 or fewer pumps are inspected, a leak from a pump is when more than two pumps have a minor liquid leak, a minor gas leak, or a gas leak greater than 10,000 ppmv and less than or equal to 50,000 ppmv. When greater than 200 pumps are inspected, a leak from a pump is when more than 1.0 % (rounded up to the nearest whole number) of the pumps have a minor liquid leak, a minor gas leak, or a gas leak greater than 10,000 ppmv and less than or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]
26. When compressors, PRDs, or other components not specified in this permit are inspected, a leak from these components is when more than one component has a minor liquid leak, a minor gas leak, or a gas leak greater than 10,000 ppmv and less than or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]
27. When 200 or fewer PRSBs are inspected, a leak is when more than four have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 PRSBs are inspected, a leak is when more than 2.0 % (rounded up to the nearest whole number) of the PRSBs have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]
28. When 200 or fewer wells at light crude oil or gas production facilities are inspected, a leak from a pipe is when more than two or more pipes have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 wells at light crude oil or gas production facilities are inspected, a leak from a pipe is when more than 1.0 % (rounded up to the nearest whole number) of the pipes have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]
29. When pipes at natural gas processing facilities are inspected, a leak from a pipe is when more than two have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4]
30. For manned facilities all accessible operating pumps, compressors, and PRDs, in service, shall be audio-visually inspected for leaks at least once every 24 hours except when operators do not report to the facility during a 24 hour period. [District Rule 4409, 5.2.1]
31. For unmanned facilities all accessible operating pumps, compressors, and PRDs, in service, shall be audio-visually inspected for leaks at least once per calendar week. [District Rule 4409, 5.2.2]
32. Any audio visual inspection of all accessible operating pumps, compressors and PRDs performed by an operator that indicate a leak that cannot be immediately repaired to meet the applicable leak standards of Rule 4409, shall be inspected not later than 24 hours after conducting the audio visual inspection. If the leak is found, the leak shall be repaired as soon as practical but not later than the time frame specified in Rule 4409. [District Rule 4409, 5.2.3]
33. Except for inaccessible components, unsafe-to-monitor components, or pipes, all components, in service, shall be tested for leaks at least once every calendar quarter. [District Rule 4409, 5.2.4]
34. All new, replaced, or repaired fittings, flanges, and threaded connections shall be tested for leaks immediately after being placed into service. [District Rule 4409, 5.2.5]
35. All inaccessible components shall be tested for leaks at least once every 12 months. [District Rule 4409, 5.2.6]
36. All unsafe-to-monitor components shall be tested for leaks during each turnaround. [District Rule 4409, 5.2.7]
37. All pipes shall be visually inspected for leaks at least once every 12 months. [District Rule 4409, 5.2.8]
38. Any visual inspection of pipes that indicate a leak that cannot be immediately repaired to meet the applicable leak standards of Rule 4409, shall be inspected not later than 24 hours after conducting the audio visual inspection. If a leak is found, the leak shall be repaired as soon as practical but not later than the time frame specified in Rule 4409. [District Rule 4409, 5.2.8.1]
39. The annual pipe inspection required by either the Department of Oil, Gas, and Geothermal Resources (DOGGR) pursuant to California Code of Regulation Title 14, Division 2, Subchapter 2, Section 1774 (Oilfield Facilities and Equipment Maintenance), or by the Spill Prevention Control and Countermeasure Plan (SPCC) pursuant to 40 Code of Federal Regulation Part 112 (Oil Prevention and Response: Non- Transportation-Related Onshore and Offshore Facilities) can be used as the annual pipe inspection required by District Rule 4409. [District Rule 4409, 5.2.8.2]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

40. Except for pumps, compressors, and PRDs, the permittee may apply for written approval from the District to change the inspection frequency of accessible components from quarterly to annually for a specific component type provided the following two qualifying requirements are met. During the previous five consecutive quarterly inspections, for the specific component type, there shall be no more leaks than as allowed by this permit. The permittee also shall not have received a Notice of Violation (NOV) from the District during the previous 12 months for violating any provisions of District Rule 4409 for the specific component type. If these two qualifying requirements have not been met, then the inspection frequency shall revert back to quarterly. The written request shall include pertinent documentation to demonstrate that the operator has successfully met the two qualifying requirements. [District Rule 4409, 5.2.9 and 5.2.10]

41. The permittee shall notify the District in writing within five calendar days after changing the inspection frequency for a specific component type. The written notification shall include the reason(s) and date of change to a quarterly inspection frequency. [District Rule 4409, 5.2.11]

42. Except as otherwise provided by District Rule 4409 for inaccessible components or unsafe to monitor components, PRDs that releases to the atmosphere shall be inspected for leaks as soon as practicable but not later than 24 hours after the time of the release. The permittee shall re-inspect the PRD for leaks not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the initial release. If the PRD is found by the permittee to be leaking during either inspection, the PRD leak shall be treated as if the leak was found during the required quarterly operator inspections. [District Rule 4409, 5.2.12]

43. Except for PRDs, a component shall be inspected for leaks not later than 15 calendar days after repairing the leak or replacing the component. [District Rule 4409, 5.2.13]

44. District inspections shall not be counted as an operator inspection required by District Rule 4409. Any attempt by an operator to count such District inspections as part of the operator's mandatory inspections is considered a willful circumvention of the rule and is a violation of this rule. [District Rule 4409, 5.2.14]

45. Upon detection of a leaking component (including those detected by audio-visual inspection), an operator shall affix to that component a weatherproof, readily visible tag, bearing the date and time when the leak was detected and the date and time of the leak measurement. For gaseous leaks, the tag shall indicate the leak concentration in ppmv. For liquid leaks, the tag shall indicate whether it is a major liquid leak or a minor liquid leak. The tag shall indicate, when applicable, whether the component is an essential component, an unsafe-to-monitor component, or a critical component. The tag shall remain in place until the leaking component is repaired or replaced and reinspected and found to be in compliance with the requirements of this rule. [District Rule 4409, 5.3.1]

46. The operator shall minimize all component leaks immediately, to the extent possible, but not later than one hour after detection of the leak in order to stop or reduce leakage to the atmosphere. If the leak has been minimized but the leak still exceeds the applicable leak standards specified in District Rule 4409, the operator shall do one of the following: 1) repair or replace the leaking component within the applicable time frame specified in District Rule 4409; 2) vent the leaking component to a closed vent system as defined by District Rule4409; 3) or remove the leaking component from operation.. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period. The start of the repair period shall be the time of the initial leak detection. [District Rule 4409, 5.3.4 and 5.3.5]

47. The operator shall repair minor gas leaks within seven days. The operator shall repair major gas leaks, which are > 10,000 ppmv but < or equal to 50,000 ppmv, within three days. The operator shall repair major gas leaks, which are > 50,000 ppmv, within two days. The operator shall repair minor liquid leaks within three days. The operator shall repair major liquid leaks within two days. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period. The start of the repair period shall be the time of the initial leak detection. [District Rule 4409, 5.3.4 and 5.3.5]

48. For each calendar quarter, the operator may extend the repair period for a total number of leaking components, not to exceed 0.05 % of the number of components inspected, by type, rounded upward to the nearest whole number. The repair period for minor gas leaks can be extended by seven additional days. The repair period for major gas leaks, which are > 10,000 ppmv but < or equal to 50,000 ppmv, can be extended by two additional days. [District Rule 4409, 5.3.5]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

49. If a leaking component is an essential component or a critical component and which cannot be shut down immediately for repairs, the operator shall do the following: 1) minimize the leak within one hour after detection of the leak; 2) and if the leak has been minimized, but the leak still exceeds the applicable leak standards of Rule 4409 as specified in this permit, the essential component or critical component shall be repaired or replaced to eliminate the leak during the next process unit turnaround. The repair shall occur no later than one year from the date of the original leak detection. [District Rule 4409, 5.3.6]

50. For any component that has incurred five repair actions for major gas leaks or major liquid leaks, or a combination of major gas leaks and major liquid leaks within a continuous 12-month period, the operator shall do one of the following four options. Options 1a through 1f require written notification to the District, option 2 requires written notification to the District and written District approval, options 3 and 4 do not require written notification to the District: 1a) For compressors replace the existing seal with either a dual mechanical seal, an oil film seal, a gas seal, or a face-type seal; 1b) for pumps replace the pump with a seal-less pump or replace the seal with a dual mechanical seal; 1c) for PRDs replace the PRD and install a rupture disc in the line which precedes the PRD such that the PRD is in series with and follows the rupture disc; 1d) for valves replace the valve with a sealed bellows valve, or for seal rings install graphite or Teflon chevron seal rings in a live-loaded packing gland; 1e) for threaded connections weld the connections or replace threaded connections with flanges; 1f) for sampling connections replace the sampling connection with a closed-loop sampling system; 2) Replace the component with Achieved-in-Practice Best Available Control Technology (BACT) equipment; 3) Vent the component to a District approved closed-vent system; 4) Remove the component from operation. For any component that is accessible, is not unsafe-to-monitor, is not an essential component, or is not a critical component, the operator shall comply with these requirements as soon as practicable but not later than twelve months after the date of detection of the fifth major leak within a continuous 12-month period. For any component that is inaccessible, is unsafe-to-monitor, is essential, or is a critical component, the operator shall comply with these requirements as soon as practicable but not later than the next turnaround or not later than two years after the date of detection of the fifth major leak within a continuous 12-month period, whichever comes first. [District Rule 4409, 5.3.7]

51. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and recordkeeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other system approved by the District that enables an operator or the District to locate each individual component. The operator shall replace physical identifications that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. [District Rule 4409, 5.4.1]

52. The operator shall keep a copy of the District approved Operator Management Plan (OMP) at the facility and make it available to the District, ARB, and EPA upon request. [District Rule 4409, 6.1.2]

53. By January 30th of each year the operator shall submit to the District for approval, in writing, an annual report indicating any changes to the existing OMP on file at the District. [District Rule 4409, 6.1.4]

54. The operator shall maintain an inspection log that has been signed and dated by the facility operator responsible for the inspection, certifying the accuracy of the information recorded in the log. The inspection log shall contain, at a minimum, all of the following information: 1) The total number of components inspected, and the total number and percentage of leaking components found by component types; 2) The location, type, name or description of each leaking component and the description of any unit where the leaking component is found; 3) Date of the leak detection and method of the leak detection; 4) For gaseous leaks, record the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak; 5) The date of repair, replacement, or removal from operation of the leaking component(s); 6) The identification and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes first; 7) The method(s) used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier; 8) The date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced; 9) The inspector's name, business mailing address, and business telephone number. [District Rule 4409, 6.2.1]

55. Records of leaks detected during quarterly or annual operator inspections, and each subsequent repair and re-inspection, shall be submitted to the District, ARB, and EPA upon request. [District Rule 4409, 6.2.2]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

56. Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components. The records shall include a copy of the current calibration gas certification from the vendor of the calibration gas cylinder, the date of calibration, the concentration of calibration gas, the instrument reading of calibration gas before adjustment, the instrument reading of calibration gas after adjustment, the calibration gas expiration date, and the calibration gas cylinder pressure at the time of calibration. [District Rule 4409, 6.2.3]

57. All records required by this permit shall be retained on-site for a minimum of five years and made available for District, ARB, and EPA inspection upon request. [District Rule 4409, 6.2.4]

58. For determining compliance with Rule 4409, all measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instructions not more than 30 days prior to its use. [District Rule 4409, 6.3.1]

59. For determining compliance with Rule 4409, the VOC content by weight percent shall be determined using ASTM D-1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 for liquids. [District Rule 4409, 6.3.2]

60. The percent by volume liquid evaporated at 302 °F (150 °C) shall be determined using ASTM D-86. [District Rule 4409, 6.3.3]

61. The TVP of any organic liquid shall be determined by measuring the Reid Vapor Pressure (RVP) using ASTM D-323, and converting the RVP to TVP at the maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance with the procedures specified in Appendix A of District Rule 4409. [District Rule 4409, 6.3.4]

62. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM D-287 or ASTM 1298. Sampling for API gravity shall be performed in accordance with ASTM D-4057. [District Rule 4409, 6.3.5]

63. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4409, 6.3.6]

64. For determining compliance with Rule 4409, halogenated exempt compounds shall be analyzed by EPA Method 18 or ARB Method 422. [District Rule 4409, 6.3.7]

65. Equipment that is in vacuum service is exempt from the control and monitoring requirements and work practice standards of District Rule 4409 provided the equipment is identified as such in the Operator Management Plan. [District Rule 4409]

66. For all components that are subject to applicable requirements of District Rule 4409 and are included in the operator management plan and that comply with the inspection, maintenance and repair requirements as specified by Rule 4409, a Title-V permit shield for applicable Rule 4409 requirements is granted. [District Rule 4409]

67. All logs required for this permit unit and all records of required monitoring data and support information shall be retained by the operator for a minimum of five years after the date of an entry, kept in a readily accessible location, and made available upon request to District personnel. [District Rules 2520, 9.4.2 and 4409, 6.2.3]

68. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-196-0 **ISSUANCE DATE:** 03/03/2009

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-125) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE (S-2234)

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. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
3. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
4. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
5. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]
6. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]
7. Fugitive VOC emissions from compressor skid shall not exceed 0.7 lb/ day. [District Rule 2201]

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-2234-196-0 : Dec 15 2009 4:16PM – ROEDERS : Joint Inspection NOT Required

8. VOC content of the total hydrocarbons in the gas stream handled shall not exceed 100% of the total hydrocarbon content by weight. [District Rules 2201]

9. VOC content of the total hydrocarbons in the gas stream handled shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]

10. The permittee shall not use any components that leak in excess of the applicable leak standards as specified in this permit. Components that have been found leaking in excess of the applicable leak standards of this rule may be used provided such leaking components have been identified with a tag for repair, are repaired, or are awaiting re-inspection after being repaired, within the applicable time period specified in this permit. [District Rule 4409, 5.1.1] Federally Enforceable Through Title V Permit

11. For valves, threaded connections, flanges, pipes, pumps, compressors, and other components subject to the requirements of Rule 4409, but not specified in this permit; a major gas leak is a detection of > 10,000 ppmv as methane; a minor gas leak is a detection of 1,000 to 10,000 ppmv as methane when the component is in liquid service; a minor gas leak is a detection of 2,000 to 10,000 ppmv as methane when the component is in gas/vapor service. [District Rule 4409, 5.1.1] Federally Enforceable Through Title V Permit

12. For pressure relief devices (PRDs); a major gas leak is a detection of > 10,000 ppmv as methane; a minor gas leak is a detection of 200 to 10,000 ppmv as methane when the component is in liquid service; a minor gas leak is a detection of 400 to 10,000 ppmv as methane when the component is in gas/vapor service. [District Rule 4409, 5.1.1] Federally Enforceable Through Title V Permit

13. Minor gas leaks from PRSBs detected during any District inspection shall not be counted toward determination of compliance with this rule provided the permittee repairs, replaces, or removes leaking PRSBs from VOC service as soon as practicable but not later than seven calendar days. [District Rule 4409, 5.1.3.1.2] Federally Enforceable Through Title V Permit

14. Leaks detected during quarterly operator inspections shall not be counted towards determination of compliance with the provisions of Rule 4409 provided the leaking components are repaired as soon as practicable but not later than the time frame specified in this permit. Leaks detected during quarterly operator inspections that are not repaired, replaced, or removed from operation as soon as practicable but not later than the time frame specified in this rule shall be counted toward determination of compliance with the provisions of Rule 4409. [District Rule 4409, 5.1.3.2.1 and 5.1.3.2.2] Federally Enforceable Through Title V Permit

15. Leaking components at this facility detected during annual operator inspections, as required by Rule 4409 for a specific component type, that exceed the leak standards specified in this permit, shall constitute a violation of this rule. This violation is regardless of whether or not the leaking components are repaired, replaced, or removed from operation within the allowable repair time frame specified in this permit. [District Rule 4409, 5.1.3.2.3] Federally Enforceable Through Title V Permit

16. An open-ended line, or a valve located at the end of the line, that is not sealed with either a blind flange, a plug, a cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended line is a leak. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4409, 5.1.4.1] Federally Enforceable Through Title V Permit

17. A leak from a component is when there is a major liquid leak from the component. A major liquid leak from a component is when a visible mist or a continuous flow of liquid, that is not seal lubricant, leaks from the component. [District Rule 4409, 5.1.4.2] Federally Enforceable Through Title V Permit

18. A leak from a component is when gas emissions greater than 50,000 ppmv, as methane, leaks from the component. [District Rule 4409, 5.1.4.3] Federally Enforceable Through Title V Permit

19. A minor liquid leak from a component is when more than three drops of liquid per minute, that is not seal lubricant and is not a major liquid leak, leaks from the component. [District Rule 4409, 5.1.4.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. When 200 or fewer valves are inspected, a leak from a valve is when more than one valve has a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 valves are inspected, a leak from a valve is when more than 0.5 % (rounded up to the nearest whole number) of the valves have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4] Federally Enforceable Through Title V Permit

21. When 200 or fewer threaded connections are inspected, a leak from a threaded connection is when more than one threaded connection has a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 threaded connections are inspected, a leak from a threaded connection is when more than 0.5 % (rounded up to the nearest whole number) of the threaded connections have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4] Federally Enforceable Through Title V Permit

22. When 200 or fewer flanges are inspected, a leak from a flange is when more than one flange has a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 flanges are inspected, a leak from a flange is when more than 0.5 % (rounded up to the nearest whole number) of the flanges have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4] Federally Enforceable Through Title V Permit

23. When compressors, PRDs, or other components not specified in this permit are inspected, a leak from these components is when more than one component has a minor liquid leak, a minor gas leak, or a gas leak greater than 10,000 ppmv and less than or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4] Federally Enforceable Through Title V Permit

24. When 200 or fewer PRSBs are inspected, a leak is when more than four have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 PRSBs are inspected, a leak is when more than 2.0 % (rounded up to the nearest whole number) of the PRSBs have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4] Federally Enforceable Through Title V Permit

25. When pipes at natural gas processing facilities are inspected, a leak from a pipe is when more than two have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4] Federally Enforceable Through Title V Permit

26. For manned facilities all accessible operating pumps, compressors, and PRDs, in service, shall be audio-visually inspected for leaks at least once every 24 hours except when operators do not report to the facility during a 24 hour period. [District Rule 4409, 5.2.1] Federally Enforceable Through Title V Permit

27. For unmanned facilities all accessible operating pumps, compressors, and PRDs, in service, shall be audio-visually inspected for leaks at least once per calendar week. [District Rule 4409, 5.2.2] Federally Enforceable Through Title V Permit

28. All accessible operating pumps, compressors, and PRDs, in service, that are found to be leaking by audio-visual inspection shall be attempted to be repaired immediately. The leaking component shall then be tested within 24 hours and, if found leaking again, shall be repaired as soon as practicable but not later than the timeframe specified in this permit. [District Rule 4409, 5.2.3] Federally Enforceable Through Title V Permit

29. Except for inaccessible components, unsafe-to-monitor components, or pipes, all components, in service, shall be tested for leaks at least once every calendar quarter. [District Rule 4409, 5.2.4] Federally Enforceable Through Title V Permit

30. All new, replaced, or repaired fittings, flanges, and threaded connections shall be tested for leaks immediately after being placed into service. [District Rule 4409, 5.2.5] Federally Enforceable Through Title V Permit

31. All inaccessible components shall be tested for leaks at least once every 12 months. [District Rule 4409, 5.2.6] Federally Enforceable Through Title V Permit

32. All unsafe-to-monitor components shall be tested for leaks during each turnaround. [District Rule 4409, 5.2.7] Federally Enforceable Through Title V Permit

33. All pipes shall be visually inspected for leaks at least once every 12 months. [District Rule 4409, 5.2.8] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

34. All pipes, in service, that are found to be leaking by visual inspection shall be attempted to be repaired immediately. The leaking pipe shall then be tested within 24 hours and, if found leaking again, shall be repaired as soon as practicable but not later than the timeframe specified in this permit. [District Rule 4409, 5.2.8.1] Federally Enforceable Through Title V Permit

35. The annual pipe inspection required by either the Department of Oil, Gas, and Geothermal Resources (DOGGR) pursuant to California Code of Regulation Title 14, Division 2, Subchapter 2, Section 1774 (Oilfield Facilities and Equipment Maintenance), or by the Spill Prevention Control and Countermeasure Plan (SPCC) pursuant to 40 Code of Federal Regulation Part 112 (Oil Prevention and Response: Non- Transportation-Related Onshore and Offshore Facilities) can be used as the annual pipe inspection required by District Rule 4409. [District Rule 4409, 5.2.8.2] Federally Enforceable Through Title V Permit

36. Except for pumps, compressors, and PRDs, the permittee may apply for written approval from the District to change the inspection frequency of accessible components from quarterly to annually for a specific component type provided the following two qualifying requirements are met. During the previous five consecutive quarterly inspections, for the specific component type, there shall be no more leaks than as allowed by this permit. The permittee also shall not have received a Notice of Violation (NOV) from the District during the previous 12 months for violating any provisions of District Rule 4409 for the specific component type. If these two qualifying requirements have not been met, then the inspection frequency shall revert back to quarterly. The written request shall include pertinent documentation to demonstrate that the operator has successfully met the two qualifying requirements. [District Rule 4409, 5.2.9 and 5.2.10] Federally Enforceable Through Title V Permit

37. The permittee shall notify the District in writing within five calendar days after changing the inspection frequency for a specific component type. The written notification shall include the reason(s) and date of change to a quarterly inspection frequency. [District Rule 4409, 5.2.11] Federally Enforceable Through Title V Permit

38. A PRD that releases to the atmosphere shall be inspected by the permittee for leaks as soon as practicable but not later than 24 hours after the time of the release. The permittee shall reinspect the PRD for leaks not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the initial release. If the PRD is found by the permittee to be leaking during either inspection, the PRD leak shall be treated as if the leak was found during the required quarterly operator inspections. [District Rule 4409, 5.2.12] Federally Enforceable Through Title V Permit

39. Except for PRDs, a component shall be inspected for leaks not later than 15 calendar days after repairing the leak or replacing the component. [District Rule 4409, 5.2.13] Federally Enforceable Through Title V Permit

40. District inspections shall not be counted as an operator inspection required by District Rule 4409. Any attempt by an operator to count such District inspections as part of the operator's mandatory inspections is considered a willful circumvention of the rule and is a violation of this rule. [District Rule 4409, 5.2.14] Federally Enforceable Through Title V Permit

41. The operator, upon detection of a leaking component, shall affix to that component a weatherproof, readily visible tag, bearing the date and time when the leak was detected and the date and time of the leak measurement. For gaseous leaks, the tag shall indicate the leak concentration in ppmv. For liquid leaks, the tag shall indicate whether it is a major liquid leak or a minor liquid leak. The tag shall indicate, when applicable, whether the component is an essential component, an unsafe-to-monitor component, or a critical component. The tag shall remain in place until the leaking component is repaired or replaced and reinspected and found to be in compliance with the requirements of this rule. [District Rule 4409, 5.3.1] Federally Enforceable Through Title V Permit

42. The operator shall minimize all component leaks immediately, to the extent possible, but not later than one hour after detection of the leak in order to stop or reduce leakage to the atmosphere. If the leak has been minimized but the leak still exceeds the applicable leak standards specified in this permit, the operator shall do one of the following within the timeframes specified within this permit: 1) repair or replace the leaking component; 2) vent the leaking component to a closed vent system; 3) or remove the leaking component from operation. A closed vent system is a District approved system that is not open to the atmosphere. It 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 a District approved control device that has a overall VOC collection and destruction or removal efficiency of at least 95%, or that transports gases or vapors back to a process system. [District Rule 4409, 5.3.4 and 5.3.5] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

43. The operator shall repair minor gas leaks within seven days. The operator shall repair major gas leaks, which are > 10,000 ppmv but < or equal to 50,000 ppmv, within three days. The operator shall repair major gas leaks, which are > 50,000 ppmv, within two days. The operator shall repair minor liquid leaks within three days. The operator shall repair major liquid leaks within two days. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period. The start of the repair period shall be the time of the initial leak detection. [District Rule 4409, 5.3.4 and 5.3.5] Federally Enforceable Through Title V Permit

44. For each calendar quarter, the operator may extend the repair period for a total number of leaking components, not to exceed 0.05 % of the number of components inspected, by type, rounded upward to the nearest whole number. The repair period for minor gas leaks can be extended by seven additional days. The repair period for major gas leaks, which are > 10,000 ppmv but < or equal to 50,000 ppmv, can be extended by two additional days. [District Rule 4409, 5.3.5] Federally Enforceable Through Title V Permit

45. If a leaking component is an essential component or a critical component and which cannot be shut down immediately for repairs, the operator shall do the following: 1) minimize the leak within one hour after detection of the leak; 2) and if the leak has been minimized, but the leak still exceeds the applicable leak standards of Rule 4409 as specified in this permit, the essential component or critical component shall be repaired or replaced to eliminate the leak during the next process unit turnaround. The repair shall occur no later than one year from the date of the original leak detection. [District Rule 4409, 5.3.6] Federally Enforceable Through Title V Permit

46. For any component that has incurred five repair actions for major gas leaks or major liquid leaks, or a combination of major gas leaks and major liquid leaks within a continuous 12-month period, the operator shall do one of the following four options. Options 1a through 1f require written notification to the District, option 2 requires written notification to the District and written District approval, options 3 and 4 do not require written notification to the District: 1a) For compressors replace the existing seal with either a dual mechanical seal, an oil film seal, a gas seal, or a face-type seal; 1b) for pumps replace the pump with a seal-less pump or replace the seal with a dual mechanical seal; 1c) for PRDs replace the PRD and install a rupture disc in the line which precedes the PRD such that the PRD is in series with and follows the rupture disc; 1d) for valves replace the valve with a sealed bellows valve, or for seal rings install graphite or Teflon chevron seal rings in a live-loaded packing gland; 1e) for threaded connections weld the connections or replace threaded connections with flanges; 1f) for sampling connections replace the sampling connection with a closed-loop sampling system; 2) Replace the component with Achieved-in-Practice Best Available Control Technology (BACT) equipment; 3) Vent the component to a District approved closed-vent system; 4) Remove the component from operation. For any component that is accessible, is not unsafe-to-monitor, is not an essential component, or is not a critical component, the operator shall comply with these requirements as soon as practicable but not later than twelve months after the date of detection of the fifth major leak within a continuous 12-month period. For any component that is inaccessible, is unsafe-to-monitor, is essential, or is a critical component, the operator shall comply with these requirements as soon as practicable but not later than the next turnaround or not later than two years after the date of detection of the fifth major leak within a continuous 12-month period, whichever comes first. [District Rule 4409, 5.3.7] Federally Enforceable Through Title V Permit

47. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and recordkeeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other system approved by the District that enables an operator or the District to locate each individual component. The operator shall replace physical identifications that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. [District Rule 4409, 5.4.1] Federally Enforceable Through Title V Permit

48. The operator shall keep a copy of the District approved Operator Management Plan (OMP) at the facility and make it available to the District, ARB, and EPA upon request. [District Rule 4409, 6.1.2] Federally Enforceable Through Title V Permit

49. By January 30th of each year the operator shall submit to the District for approval, in writing, an annual report indicating any changes to the existing OMP on file at the District. [District Rule 4409, 6.1.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

50. The operator shall maintain an inspection log that has been signed and dated by the facility operator responsible for the inspection, certifying the accuracy of the information recorded in the log. The inspection log shall contain, at a minimum, all of the following information: 1) The total number of components inspected, and the total number and percentage of leaking components found by component types; 2) The location, type, name or description of each leaking component and the description of any unit where the leaking component is found; 3) Date of the leak detection and method of the leak detection; 4) For gaseous leaks, record the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak; 5) The date of repair, replacement, or removal from operation of the leaking component(s); 6) The identification and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes first; 7) The method(s) used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier; 8) The date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced; 9) The inspector's name, business mailing address, and business telephone number. [District Rule 4409, 6.2.1] Federally Enforceable Through Title V Permit

51. Records of leaks detected during quarterly or annual operator inspections, and each subsequent repair and re-inspection, shall be submitted to the District, ARB, and EPA upon request. [District Rule 4409, 6.2.2] Federally Enforceable Through Title V Permit

52. Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components. The records shall include a copy of the current calibration gas certification from the vendor of the calibration gas cylinder, the date of calibration, the concentration of calibration gas, the instrument reading of calibration gas before adjustment, the instrument reading of calibration gas after adjustment, the calibration gas expiration date, and the calibration gas cylinder pressure at the time of calibration. [District Rule 4409, 6.2.3] Federally Enforceable Through Title V Permit

53. All records required by this permit shall be retained on-site for a minimum of five years and made available for District, ARB, and EPA inspection upon request. [District Rule 4409, 6.2.4] Federally Enforceable Through Title V Permit

54. All measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instructions not more than 30 days prior to its use. [District Rule 4409, 6.3.1] Federally Enforceable Through Title V Permit

55. The VOC content by weight percent shall be determined using ASTM D-1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 for liquids. [District Rule 4409, 6.3.2] Federally Enforceable Through Title V Permit

56. The percent by volume liquid evaporated at 302 °F (150 °C) shall be determined using ASTM D-86. [District Rule 4409, 6.3.3] Federally Enforceable Through Title V Permit

57. Halogenated exempt compounds shall be analyzed by EPA Method 18 or ARB Method 422. [District Rule 4409, 6.3.7] Federally Enforceable Through Title V Permit

58. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]

59. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

60. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 83. lb, 2nd quarter - 83. lb, 3rd quarter - 83. lb, and fourth quarter - 83. lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201] Federally Enforceable Through Title V Permit

61. ERC Certificate Numbers S-1704-1 shall be used to supply the required VOC offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-197-0 **ISSUANCE DATE:** 03/03/2009

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-126) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE (S-2234)

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. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
3. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
4. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
5. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]
6. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]
7. Fugitive VOC emissions from compressor skid shall not exceed 0.7 lb/ day. [District Rule 2201]

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-2234-197-0 : Dec 15 2009 4:18PM – ROEDERS : Joint Inspection NOT Required

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8. VOC content of the total hydrocarbons in the gas stream handled shall not exceed 100% of the total hydrocarbon content by weight. [District Rules 2201]

9. VOC content of the total hydrocarbons in the gas stream handled shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]

10. The permittee shall not use any components that leak in excess of the applicable leak standards as specified in this permit. Components that have been found leaking in excess of the applicable leak standards of this rule may be used provided such leaking components have been identified with a tag for repair, are repaired, or are awaiting re-inspection after being repaired, within the applicable time period specified in this permit. [District Rule 4409, 5.1.1] Federally Enforceable Through Title V Permit

11. For valves, threaded connections, flanges, pipes, pumps, compressors, and other components subject to the requirements of Rule 4409, but not specified in this permit; a major gas leak is a detection of > 10,000 ppmv as methane; a minor gas leak is a detection of 1,000 to 10,000 ppmv as methane when the component is in liquid service; a minor gas leak is a detection of 2,000 to 10,000 ppmv as methane when the component is in gas/vapor service. [District Rule 4409, 5.1.1] Federally Enforceable Through Title V Permit

12. For pressure relief devices (PRDs); a major gas leak is a detection of > 10,000 ppmv as methane; a minor gas leak is a detection of 200 to 10,000 ppmv as methane when the component is in liquid service; a minor gas leak is a detection of 400 to 10,000 ppmv as methane when the component is in gas/vapor service. [District Rule 4409, 5.1.1] Federally Enforceable Through Title V Permit

13. Minor gas leaks from PRSBs detected during any District inspection shall not be counted toward determination of compliance with this rule provided the permittee repairs, replaces, or removes leaking PRSBs from VOC service as soon as practicable but not later than seven calendar days. [District Rule 4409, 5.1.3.1.2] Federally Enforceable Through Title V Permit

14. Leaks detected during quarterly operator inspections shall not be counted towards determination of compliance with the provisions of Rule 4409 provided the leaking components are repaired as soon as practicable but not later than the time frame specified in this permit. Leaks detected during quarterly operator inspections that are not repaired, replaced, or removed from operation as soon as practicable but not later than the time frame specified in this rule shall be counted toward determination of compliance with the provisions of Rule 4409. [District Rule 4409, 5.1.3.2.1 and 5.1.3.2.2] Federally Enforceable Through Title V Permit

15. Leaking components at this facility detected during annual operator inspections, as required by Rule 4409 for a specific component type, that exceed the leak standards specified in this permit, shall constitute a violation of this rule. This violation is regardless of whether or not the leaking components are repaired, replaced, or removed from operation within the allowable repair time frame specified in this permit. [District Rule 4409, 5.1.3.2.3] Federally Enforceable Through Title V Permit

16. An open-ended line, or a valve located at the end of the line, that is not sealed with either a blind flange, a plug, a cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended line is a leak. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4409, 5.1.4.1] Federally Enforceable Through Title V Permit

17. A leak from a component is when there is a major liquid leak from the component. A major liquid leak from a component is when a visible mist or a continuous flow of liquid, that is not seal lubricant, leaks from the component. [District Rule 4409, 5.1.4.2] Federally Enforceable Through Title V Permit

18. A leak from a component is when gas emissions greater than 50,000 ppmv, as methane, leaks from the component. [District Rule 4409, 5.1.4.3] Federally Enforceable Through Title V Permit

19. A minor liquid leak from a component is when more than three drops of liquid per minute, that is not seal lubricant and is not a major liquid leak, leaks from the component. [District Rule 4409, 5.1.4.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. When 200 or fewer valves are inspected, a leak from a valve is when more than one valve has a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 valves are inspected, a leak from a valve is when more than 0.5 % (rounded up to the nearest whole number) of the valves have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4] Federally Enforceable Through Title V Permit

21. When 200 or fewer threaded connections are inspected, a leak from a threaded connection is when more than one threaded connection has a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 threaded connections are inspected, a leak from a threaded connection is when more than 0.5 % (rounded up to the nearest whole number) of the threaded connections have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4] Federally Enforceable Through Title V Permit

22. When 200 or fewer flanges are inspected, a leak from a flange is when more than one flange has a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 flanges are inspected, a leak from a flange is when more than 0.5 % (rounded up to the nearest whole number) of the flanges have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4] Federally Enforceable Through Title V Permit

23. When compressors, PRDs, or other components not specified in this permit are inspected, a leak from these components is when more than one component has a minor liquid leak, a minor gas leak, or a gas leak greater than 10,000 ppmv and less than or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4] Federally Enforceable Through Title V Permit

24. When 200 or fewer PRSBs are inspected, a leak is when more than four have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. When greater than 200 PRSBs are inspected, a leak is when more than 2.0 % (rounded up to the nearest whole number) of the PRSBs have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4] Federally Enforceable Through Title V Permit

25. When pipes at natural gas processing facilities are inspected, a leak from a pipe is when more than two have a minor liquid leak, a minor gas leak, or a gas leak > 10,000 ppmv and < or equal to 50,000 ppmv. [District Rule 4409, 5.1.4.4] Federally Enforceable Through Title V Permit

26. For manned facilities all accessible operating pumps, compressors, and PRDs, in service, shall be audio-visually inspected for leaks at least once every 24 hours except when operators do not report to the facility during a 24 hour period. [District Rule 4409, 5.2.1] Federally Enforceable Through Title V Permit

27. For unmanned facilities all accessible operating pumps, compressors, and PRDs, in service, shall be audio-visually inspected for leaks at least once per calendar week. [District Rule 4409, 5.2.2] Federally Enforceable Through Title V Permit

28. All accessible operating pumps, compressors, and PRDs, in service, that are found to be leaking by audio-visual inspection shall be attempted to be repaired immediately. The leaking component shall then be tested within 24 hours and, if found leaking again, shall be repaired as soon as practicable but not later than the timeframe specified in this permit. [District Rule 4409, 5.2.3] Federally Enforceable Through Title V Permit

29. Except for inaccessible components, unsafe-to-monitor components, or pipes, all components, in service, shall be tested for leaks at least once every calendar quarter. [District Rule 4409, 5.2.4] Federally Enforceable Through Title V Permit

30. All new, replaced, or repaired fittings, flanges, and threaded connections shall be tested for leaks immediately after being placed into service. [District Rule 4409, 5.2.5] Federally Enforceable Through Title V Permit

31. All inaccessible components shall be tested for leaks at least once every 12 months. [District Rule 4409, 5.2.6] Federally Enforceable Through Title V Permit

32. All unsafe-to-monitor components shall be tested for leaks during each turnaround. [District Rule 4409, 5.2.7] Federally Enforceable Through Title V Permit

33. All pipes shall be visually inspected for leaks at least once every 12 months. [District Rule 4409, 5.2.8] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

34. All pipes, in service, that are found to be leaking by visual inspection shall be attempted to be repaired immediately. The leaking pipe shall then be tested within 24 hours and, if found leaking again, shall be repaired as soon as practicable but not later than the timeframe specified in this permit. [District Rule 4409, 5.2.8.1] Federally Enforceable Through Title V Permit

35. The annual pipe inspection required by either the Department of Oil, Gas, and Geothermal Resources (DOGGR) pursuant to California Code of Regulation Title 14, Division 2, Subchapter 2, Section 1774 (Oilfield Facilities and Equipment Maintenance), or by the Spill Prevention Control and Countermeasure Plan (SPCC) pursuant to 40 Code of Federal Regulation Part 112 (Oil Prevention and Response: Non- Transportation-Related Onshore and Offshore Facilities) can be used as the annual pipe inspection required by District Rule 4409. [District Rule 4409, 5.2.8.2] Federally Enforceable Through Title V Permit

36. Except for pumps, compressors, and PRDs, the permittee may apply for written approval from the District to change the inspection frequency of accessible components from quarterly to annually for a specific component type provided the following two qualifying requirements are met. During the previous five consecutive quarterly inspections, for the specific component type, there shall be no more leaks than as allowed by this permit. The permittee also shall not have received a Notice of Violation (NOV) from the District during the previous 12 months for violating any provisions of District Rule 4409 for the specific component type. If these two qualifying requirements have not been met, then the inspection frequency shall revert back to quarterly. The written request shall include pertinent documentation to demonstrate that the operator has successfully met the two qualifying requirements. [District Rule 4409, 5.2.9 and 5.2.10] Federally Enforceable Through Title V Permit

37. The permittee shall notify the District in writing within five calendar days after changing the inspection frequency for a specific component type. The written notification shall include the reason(s) and date of change to a quarterly inspection frequency. [District Rule 4409, 5.2.11] Federally Enforceable Through Title V Permit

38. A PRD that releases to the atmosphere shall be inspected by the permittee for leaks as soon as practicable but not later than 24 hours after the time of the release. The permittee shall reinspect the PRD for leaks not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the initial release. If the PRD is found by the permittee to be leaking during either inspection, the PRD leak shall be treated as if the leak was found during the required quarterly operator inspections. [District Rule 4409, 5.2.12] Federally Enforceable Through Title V Permit

39. Except for PRDs, a component shall be inspected for leaks not later than 15 calendar days after repairing the leak or replacing the component. [District Rule 4409, 5.2.13] Federally Enforceable Through Title V Permit

40. District inspections shall not be counted as an operator inspection required by District Rule 4409. Any attempt by an operator to count such District inspections as part of the operator's mandatory inspections is considered a willful circumvention of the rule and is a violation of this rule. [District Rule 4409, 5.2.14] Federally Enforceable Through Title V Permit

41. The operator, upon detection of a leaking component, shall affix to that component a weatherproof, readily visible tag, bearing the date and time when the leak was detected and the date and time of the leak measurement. For gaseous leaks, the tag shall indicate the leak concentration in ppmv. For liquid leaks, the tag shall indicate whether it is a major liquid leak or a minor liquid leak. The tag shall indicate, when applicable, whether the component is an essential component, an unsafe-to-monitor component, or a critical component. The tag shall remain in place until the leaking component is repaired or replaced and reinspected and found to be in compliance with the requirements of this rule. [District Rule 4409, 5.3.1] Federally Enforceable Through Title V Permit

42. The operator shall minimize all component leaks immediately, to the extent possible, but not later than one hour after detection of the leak in order to stop or reduce leakage to the atmosphere. If the leak has been minimized but the leak still exceeds the applicable leak standards specified in this permit, the operator shall do one of the following within the timeframes specified within this permit: 1) repair or replace the leaking component; 2) vent the leaking component to a closed vent system; 3) or remove the leaking component from operation. A closed vent system is a District approved system that is not open to the atmosphere. It 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 a District approved control device that has a overall VOC collection and destruction or removal efficiency of at least 95%, or that transports gases or vapors back to a process system. [District Rule 4409, 5.3.4 and 5.3.5] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

43. The operator shall repair minor gas leaks within seven days. The operator shall repair major gas leaks, which are > 10,000 ppmv but < or equal to 50,000 ppmv, within three days. The operator shall repair major gas leaks, which are > 50,000 ppmv, within two days. The operator shall repair minor liquid leaks within three days. The operator shall repair major liquid leaks within two days. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period. The start of the repair period shall be the time of the initial leak detection. [District Rule 4409, 5.3.4 and 5.3.5] Federally Enforceable Through Title V Permit

44. For each calendar quarter, the operator may extend the repair period for a total number of leaking components, not to exceed 0.05 % of the number of components inspected, by type, rounded upward to the nearest whole number. The repair period for minor gas leaks can be extended by seven additional days. The repair period for major gas leaks, which are > 10,000 ppmv but < or equal to 50,000 ppmv, can be extended by two additional days. [District Rule 4409, 5.3.5] Federally Enforceable Through Title V Permit

45. If a leaking component is an essential component or a critical component and which cannot be shut down immediately for repairs, the operator shall do the following: 1) minimize the leak within one hour after detection of the leak; 2) and if the leak has been minimized, but the leak still exceeds the applicable leak standards of Rule 4409 as specified in this permit, the essential component or critical component shall be repaired or replaced to eliminate the leak during the next process unit turnaround. The repair shall occur no later than one year from the date of the original leak detection. [District Rule 4409, 5.3.6] Federally Enforceable Through Title V Permit

46. For any component that has incurred five repair actions for major gas leaks or major liquid leaks, or a combination of major gas leaks and major liquid leaks within a continuous 12-month period, the operator shall do one of the following four options. Options 1a through 1f require written notification to the District, option 2 requires written notification to the District and written District approval, options 3 and 4 do not require written notification to the District: 1a) For compressors replace the existing seal with either a dual mechanical seal, an oil film seal, a gas seal, or a face-type seal; 1b) for pumps replace the pump with a seal-less pump or replace the seal with a dual mechanical seal; 1c) for PRDs replace the PRD and install a rupture disc in the line which precedes the PRD such that the PRD is in series with and follows the rupture disc; 1d) for valves replace the valve with a sealed bellows valve, or for seal rings install graphite or Teflon chevron seal rings in a live-loaded packing gland; 1e) for threaded connections weld the connections or replace threaded connections with flanges; 1f) for sampling connections replace the sampling connection with a closed-loop sampling system; 2) Replace the component with Achieved-in-Practice Best Available Control Technology (BACT) equipment; 3) Vent the component to a District approved closed-vent system; 4) Remove the component from operation. For any component that is accessible, is not unsafe-to-monitor, is not an essential component, or is not a critical component, the operator shall comply with these requirements as soon as practicable but not later than twelve months after the date of detection of the fifth major leak within a continuous 12-month period. For any component that is inaccessible, is unsafe-to-monitor, is essential, or is a critical component, the operator shall comply with these requirements as soon as practicable but not later than the next turnaround or not later than two years after the date of detection of the fifth major leak within a continuous 12-month period, whichever comes first. [District Rule 4409, 5.3.7] Federally Enforceable Through Title V Permit

47. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and recordkeeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other system approved by the District that enables an operator or the District to locate each individual component. The operator shall replace physical identifications that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. [District Rule 4409, 5.4.1] Federally Enforceable Through Title V Permit

48. The operator shall keep a copy of the District approved Operator Management Plan (OMP) at the facility and make it available to the District, ARB, and EPA upon request. [District Rule 4409, 6.1.2] Federally Enforceable Through Title V Permit

49. By January 30th of each year the operator shall submit to the District for approval, in writing, an annual report indicating any changes to the existing OMP on file at the District. [District Rule 4409, 6.1.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

50. The operator shall maintain an inspection log that has been signed and dated by the facility operator responsible for the inspection, certifying the accuracy of the information recorded in the log. The inspection log shall contain, at a minimum, all of the following information: 1) The total number of components inspected, and the total number and percentage of leaking components found by component types; 2) The location, type, name or description of each leaking component and the description of any unit where the leaking component is found; 3) Date of the leak detection and method of the leak detection; 4) For gaseous leaks, record the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak; 5) The date of repair, replacement, or removal from operation of the leaking component(s); 6) The identification and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes first; 7) The method(s) used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier; 8) The date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced; 9) The inspector's name, business mailing address, and business telephone number. [District Rule 4409, 6.2.1] Federally Enforceable Through Title V Permit

51. Records of leaks detected during quarterly or annual operator inspections, and each subsequent repair and re-inspection, shall be submitted to the District, ARB, and EPA upon request. [District Rule 4409, 6.2.2] Federally Enforceable Through Title V Permit

52. Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components. The records shall include a copy of the current calibration gas certification from the vendor of the calibration gas cylinder, the date of calibration, the concentration of calibration gas, the instrument reading of calibration gas before adjustment, the instrument reading of calibration gas after adjustment, the calibration gas expiration date, and the calibration gas cylinder pressure at the time of calibration. [District Rule 4409, 6.2.3] Federally Enforceable Through Title V Permit

53. All records required by this permit shall be retained on-site for a minimum of five years and made available for District, ARB, and EPA inspection upon request. [District Rule 4409, 6.2.4] Federally Enforceable Through Title V Permit

54. All measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instructions not more than 30 days prior to its use. [District Rule 4409, 6.3.1] Federally Enforceable Through Title V Permit

55. The VOC content by weight percent shall be determined using ASTM D-1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 for liquids. [District Rule 4409, 6.3.2] Federally Enforceable Through Title V Permit

56. The percent by volume liquid evaporated at 302 °F (150 °C) shall be determined using ASTM D-86. [District Rule 4409, 6.3.3] Federally Enforceable Through Title V Permit

57. Halogenated exempt compounds shall be analyzed by EPA Method 18 or ARB Method 422. [District Rule 4409, 6.3.7] Federally Enforceable Through Title V Permit

58. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]

59. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

60. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 83. lb, 2nd quarter - 83. lb, 3rd quarter - 83. lb, and fourth quarter - 83. lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201] Federally Enforceable Through Title V Permit

61. ERC Certificate Numbers S-1704-1 shall be used to supply the required VOC offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-200-0 **ISSUANCE DATE:** 02/23/2009

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (R-22) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE

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. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
3. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
4. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
5. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]
6. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]
7. Fugitive VOC emissions from compressor skid shall not exceed 0.46 lb/ day. [District Rule 2201]

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-2234-200-0 : Dec 15 2009 4:19PM -- ROEDERS : Joint Inspection NOT Required

8. VOC content of the gas stream processed shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
9. VOC content of the gas stream processed shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
10. VOC content of gas shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
11. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
12. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201 and 4403]
13. All piping, connectors, valves, seals, and fittings shall be constructed and maintained such that there are no components leaking 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 shall be reported as a deviation. [District Rule 2201]
14. All piping, connectors, valves, seals, and fittings shall be inspected, tagged and repaired in accordance with the requirements set forth in District rule 4409. [District Rule 2201]
15. Operator shall maintain an inspection log and record keeping in accordance with the requirements set forth in District rule 4409. [District Rule 2201]
16. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-201-0 **ISSUANCE DATE:** 02/23/2009

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-107) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE

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. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
3. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
4. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
5. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]
6. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]
7. Fugitive VOC emissions from compressor skid shall not exceed 0.35 lb/ day. [District Rule 2201]

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
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8. VOC content of the gas stream processed shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
9. VOC content of the gas stream processed shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
10. VOC content of gas shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
11. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
12. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201]
13. All piping, connectors, valves, seals, and fittings shall be constructed and maintained such that there are no components leaking 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 shall be reported as a deviation. [District Rule 2201]
14. All piping, connectors, valves, seals, and fittings shall be inspected, tagged and repaired in accordance with the requirements set forth in District rule 4409. [District Rule 2201]
15. Operator shall maintain an inspection log and record keeping in accordance with the requirements set forth in District rule 4409. [District Rule 2201]
16. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-202-0 **ISSUANCE DATE:** 02/23/2009

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-55) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE

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. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
3. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
4. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
5. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]
6. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]
7. Fugitive VOC emissions from compressor skid shall not exceed 0.35 lb/ day. [District Rule 2201]

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
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8. VOC content of the gas stream processed shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
9. VOC content of the gas stream processed shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
10. VOC content of gas shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
11. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
12. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201]
13. All piping, connectors, valves, seals, and fittings shall be constructed and maintained such that there are no components leaking 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 shall be reported as a deviation. [District Rule 2201]
14. All piping, connectors, valves, seals, and fittings shall be inspected, tagged and repaired in accordance with the requirements set forth in District rule 4409. [District Rule 2201]
15. Operator shall maintain an inspection log and record keeping in accordance with the requirements set forth in District rule 4409. [District Rule 2201]
16. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2234-203-0 **ISSUANCE DATE:** 02/23/2009

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

EQUIPMENT DESCRIPTION:
ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-56) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE

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. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this compressor skid. [District Rule 2201]
3. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201]
4. Compressor skid shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC Section 42301.6]
5. Compressor skid shall only be used in conjunction with gas processing operations where gas is routed to a gas plant, sales line, or gas injection well. Compressor skid shall not be used as part of a permitted operation without first obtaining an Authority to Construct to modify the operation to include the compressor skid. [District Rule 2201]
6. Permittee shall maintain accurate component count for compressor skid 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 emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201]
7. Fugitive VOC emissions from compressor skid shall not exceed 0.35 lb/ day. [District Rule 2201]

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-2234-203-0 : Dec 15 2009 4:19PM – ROEDERS : Joint Inspection NOT Required

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8. VOC content of the gas stream processed shall not exceed 50% of the total hydrocarbon content by weight. [District Rules 2201]
9. VOC content of the gas stream processed shall be tested upon implementation of this Authority to Construct and thereafter not less than annually. [District Rule 2201]
10. VOC content of gas shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
11. Permittee shall maintain a record of the VOC content test results for a period of five years and make such records available for inspection upon request. [District Rule 1070]
12. There shall be no leaks from fugitive components in liquid service greater than three (3) drops per minute. [District Rules 2201]
13. All piping, connectors, valves, seals, and fittings shall be constructed and maintained such that there are no components leaking 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 shall be reported as a deviation. [District Rule 2201]
14. All piping, connectors, valves, seals, and fittings shall be inspected, tagged and repaired in accordance with the requirements set forth in District rule 4409. [District Rule 2201]
15. Operator shall maintain an inspection log and record keeping in accordance with the requirements set forth in District rule 4409. [District Rule 2201]
16. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

Appendix F
Emission Profiles

Application Emissions

Permit #: S-2234-122-2	Last Updated
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	184.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.5
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	16.0
Q2:	0.0	0.0	0.0	0.0	16.0
Q3:	0.0	0.0	0.0	0.0	16.0
Q4:	0.0	0.0	0.0	0.0	16.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-123-2	Last Updated
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	1808.0	262.0	476.0	12732.0	3331.0
Daily Emis. Limit (lb/Day)	5.0	0.7	1.3	33.9	9.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-124-2	Last Updated
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	1808.0	262.0	476.0	12732.0	3331.0
Daily Emis. Limit (lb/Day)	5.0	0.7	1.3	33.9	9.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-125-3	Last Updated
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	1808.0	262.0	476.0	12732.0	3331.0
Daily Emis. Limit (lb/Day)	5.0	0.7	1.3	33.9	9.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-126-2	Last Updated
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	1808.0	262.0	476.0	12732.0	3331.0
Daily Emis. Limit (lb/Day)	5.0	0.7	1.3	33.9	9.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-127-1	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	1808.0	262.0	476.0	12732.0	3331.0
Daily Emis. Limit (lb/Day)	5.0	0.7	1.3	33.9	9.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-128-2	Last Updated
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	1808.0	262.0	476.0	12732.0	3331.0
Daily Emis. Limit (lb/Day)	5.0	0.7	1.3	33.9	9.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-129-2	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	1808.0	262.0	476.0	12732.0	3331.0
Daily Emis. Limit (lb/Day)	5.0	0.7	1.3	33.9	9.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-130-1	Last Updated
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	1808.0	262.0	476.0	12732.0	3331.0
Daily Emis. Limit (lb/Day)	5.0	0.7	1.3	33.9	9.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-2234-131-1	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	1808.0	262.0	476.0	12732.0	3331.0
Daily Emis. Limit (lb/Day)	5.0	0.7	1.3	33.9	9.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-132-1	Last Updated
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	1808.0	262.0	476.0	12732.0	3331.0
Daily Emis. Limit (lb/Day)	5.0	0.7	1.3	33.9	9.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-133-1	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	1808.0	262.0	476.0	12732.0	3331.0
Daily Emis. Limit (lb/Day)	5.0	0.7	1.3	33.9	9.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-2234-134-1	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	1808.0	262.0	476.0	12732.0	3331.0
Daily Emis. Limit (lb/Day)	5.0	0.7	1.3	33.9	9.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-135-1	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	1808.0	262.0	476.0	12732.0	3331.0
Daily Emis. Limit (lb/Day)	5.0	0.7	1.3	33.9	9.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-136-1	Last Updated
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	1808.0	262.0	476.0	12732.0	3331.0
Daily Emis. Limit (lb/Day)	5.0	0.7	1.3	33.9	9.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-137-2	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	1808.0	262.0	476.0	12732.0	3331.0
Daily Emis. Limit (lb/Day)	5.0	0.7	1.3	33.9	9.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-139-2	Last Updated
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	238.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-2234-140-2	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	238.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-2234-141-2	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	238.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-2234-142-2	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	255.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	32.0
Q2:	0.0	0.0	0.0	0.0	32.0
Q3:	0.0	0.0	0.0	0.0	32.0
Q4:	0.0	0.0	0.0	0.0	32.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-143-2	Last Updated
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	255.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	32.0
Q2:	0.0	0.0	0.0	0.0	32.0
Q3:	0.0	0.0	0.0	0.0	32.0
Q4:	0.0	0.0	0.0	0.0	32.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-2234-144-2	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	255.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	32.0
Q2:	0.0	0.0	0.0	0.0	32.0
Q3:	0.0	0.0	0.0	0.0	32.0
Q4:	0.0	0.0	0.0	0.0	32.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-2234-145-2	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	255.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	32.0
Q2:	0.0	0.0	0.0	0.0	32.0
Q3:	0.0	0.0	0.0	0.0	32.0
Q4:	0.0	0.0	0.0	0.0	32.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-2234-147-2	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	255.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	32.0
Q2:	0.0	0.0	0.0	0.0	32.0
Q3:	0.0	0.0	0.0	0.0	32.0
Q4:	0.0	0.0	0.0	0.0	32.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-150-2	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	238.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-2234-151-2	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	238.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-152-2	Last Updated
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	238.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-2234-153-2	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	238.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-154-2	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	238.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-157-1	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	238.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-2234-158-1	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	238.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-159-1	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	238.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-160-1	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	238.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-161-1	Last Updated
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	255.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	32.0
Q2:	0.0	0.0	0.0	0.0	32.0
Q3:	0.0	0.0	0.0	0.0	32.0
Q4:	0.0	0.0	0.0	0.0	32.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-2234-162-1	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	255.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	32.0
Q2:	0.0	0.0	0.0	0.0	32.0
Q3:	0.0	0.0	0.0	0.0	32.0
Q4:	0.0	0.0	0.0	0.0	32.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-163-1	Last Updated
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	255.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	32.0
Q2:	0.0	0.0	0.0	0.0	32.0
Q3:	0.0	0.0	0.0	0.0	32.0
Q4:	0.0	0.0	0.0	0.0	32.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-164-1	Last Updated
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	255.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	32.0
Q2:	0.0	0.0	0.0	0.0	32.0
Q3:	0.0	0.0	0.0	0.0	32.0
Q4:	0.0	0.0	0.0	0.0	32.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-165-1	Last Updated
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	255.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	32.0
Q2:	0.0	0.0	0.0	0.0	32.0
Q3:	0.0	0.0	0.0	0.0	32.0
Q4:	0.0	0.0	0.0	0.0	32.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-166-1	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	255.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	32.0
Q2:	0.0	0.0	0.0	0.0	32.0
Q3:	0.0	0.0	0.0	0.0	32.0
Q4:	0.0	0.0	0.0	0.0	32.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-167-1	Last Updated
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	255.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	32.0
Q2:	0.0	0.0	0.0	0.0	32.0
Q3:	0.0	0.0	0.0	0.0	32.0
Q4:	0.0	0.0	0.0	0.0	32.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-2234-172-1	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	206.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.6
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	16.0
Q2:	0.0	0.0	0.0	0.0	16.0
Q3:	0.0	0.0	0.0	0.0	16.0
Q4:	0.0	0.0	0.0	0.0	16.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-2234-175-1	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	690.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	1.9
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	86.0
Q2:	0.0	0.0	0.0	0.0	86.0
Q3:	0.0	0.0	0.0	0.0	86.0
Q4:	0.0	0.0	0.0	0.0	87.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					1.0
Quarterly Offset Amounts (lb/Qtr)					
Q1:					86.0
Q2:					86.0
Q3:					86.0
Q4:					87.0

Permit #: S-2234-176-1	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	184.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.5
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	23.0
Q2:	0.0	0.0	0.0	0.0	23.0
Q3:	0.0	0.0	0.0	0.0	23.0
Q4:	0.0	0.0	0.0	0.0	23.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-180-1	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	279.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.8
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	20.0
Q2:	0.0	0.0	0.0	0.0	20.0
Q3:	0.0	0.0	0.0	0.0	20.0
Q4:	0.0	0.0	0.0	0.0	20.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-2234-181-1	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	279.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.8
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	20.0
Q2:	0.0	0.0	0.0	0.0	20.0
Q3:	0.0	0.0	0.0	0.0	20.0
Q4:	0.0	0.0	0.0	0.0	20.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-2234-196-1	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	255.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-197-1	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	255.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-200-1	Last Updated
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	238.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-2234-201-1	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	255.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	32.0
Q2:	0.0	0.0	0.0	0.0	32.0
Q3:	0.0	0.0	0.0	0.0	32.0
Q4:	0.0	0.0	0.0	0.0	32.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Application Emissions

Permit #: S-2234-202-1	Last Updated
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	255.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	32.0
Q2:	0.0	0.0	0.0	0.0	32.0
Q3:	0.0	0.0	0.0	0.0	32.0
Q4:	0.0	0.0	0.0	0.0	32.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-2234-203-1	**Last Updated**
Facility: OCCIDENTAL OF ELK HILLS, INC.	12/15/2009 ROEDERS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	255.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.7
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	32.0
Q2:	0.0	0.0	0.0	0.0	32.0
Q3:	0.0	0.0	0.0	0.0	32.0
Q4:	0.0	0.0	0.0	0.0	32.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Appendix G
Draft ATCs

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-122-2 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: NW36 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF GLYCOL DEHYDRATION SKID MOUNTED UNIT WITH A GLYCOL CONTACTOR, SEPARATOR COALESCER, SEVERAL GLYCOL HEAT EXCHANGERS, REBOILER/REGENERATOR EQUIPPED WITH 1.5 MMBTU/HR BURNER, GLYCOL SURGE TANK, FLASH SEPARATOR, LEAN/RICH GLYCOL EXCHANGER, VARIOUS PUMPS AND FILTERS, WITH PROCESS VENT CONNECTED TO EXISTING VACUUM GAS GATHERING SYSTEM: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Glycol reboiler heater shall be fired on natural gas containing no more than 0.75 gr S/100 scf and no more than 5% by weight hydrocarbons heavier that butane. [District Rule 2020] Federally Enforceable Through Title V Permit
4. Only glycol shall be used as the dehydration medium. [District Rule 2201] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-122-2 : Feb 18 2010 1:24PM – ROEDERS : Joint Inspection NOT Required

5. Flash tank and dehydrator vent shall be vented to gas gathering system. [District Rules 2201 and 4408] Federally Enforceable Through Title V Permit
6. Condensate handling shall be conducted in closed systems resulting in fugitive component emissions only. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The glycol dehydration system shall not be operated unless all vapors are directed to the vapor recovery system, a fuel gas system or a sales gas system, or a system in which VOC emissions are combusted by a flare, incinerator, reboiler, or thermal oxidizer. [District Rule 4408, 5.1] Federally Enforceable Through Title V Permit
8. The condensed hydrocarbon liquid stream from the glycol dehydration vent shall be stored and handled in a manner that will not cause or allow evaporation of VOC to the atmosphere. [District Rule 4408, 5.2] Federally Enforceable Through Title V Permit
9. A leak is defined as the dripping at a rate of more than three (3) drops per minute of liquid containing VOCs or a reading as methane in excess of 10,000 ppm above background when measured at a distance of one (1) centimeter from the potential source in accordance with EPA Method 21. [District Rule 4408, 3.8.1] Federally Enforceable Through Title V Permit
10. All control systems shall be maintained in a leak-free condition as determined by EPA Method 21. [District Rule 4408, 5.3] Federally Enforceable Through Title V Permit
11. VOC control efficiency shall be no less than 95% by weight. [District Rule 4408, 5.1] Federally Enforceable Through Title V Permit
12. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.5 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. This operation shall comply with the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
14. The operator shall maintain monthly records of the amount of gas dehydrated (MMSCF). [District Rule 4408, 6.1.1] Federally Enforceable Through Title V Permit
15. The operator of any glycol dehydration system shall maintain the following records: facility name and APCD permit number; description of any installed VOC control system; flow diagram of dehydrator and any VOC controls; and maintenance records of the VOC control system. [District Rule 4408, 6.1.2] Federally Enforceable Through Title V Permit
16. The records listed in Sections 6.1.1, 6.1.2, and 6.1.3 shall be retained on the premises for a period of not less than five years and made available to any District representative upon request. [District Rule 4408, 6.1] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-123-2 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 35 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-14) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-123-2 : Feb 18 2010 1:25PM – ROEDERS : Joint Inspection NOT Required

6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from this IC engine shall not exceed any of the following limits: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District Rules 2201 and 4702, 5.1] Federally Enforceable Through Title V Permit
10. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The fuel consumption limit for this engine shall not exceed 241,600 scf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
13. If the IC engine is fired on PUC-regulated natural gas, the permittee shall retain on file, copies of all natural gas bills. [District Rule 2201] Federally Enforceable Through Title V Permit
14. If the engine is fired on non-PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the engine is fired on non-PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The permittee shall install and operate a nonresettable elapsed operating time meter. The elapsed operating time meter shall be properly maintained in accordance with the manufacturer's specifications. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
17. Source testing to measure the stack NOx, CO, and VOC emissions from this unit shall be conducted not less than once every twelve (12) months. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
20. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25A or 25B or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rule 4702, 6.4] Federally Enforceable Through Title V Permit
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. NOx, CO and VOC concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

22. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080] Federally Enforceable Through Title V Permit

23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit

24. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702, 6.5] Federally Enforceable Through Title V Permit

25. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.9] Federally Enforceable Through Title V Permit

26. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

27. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rule 4702, 5.6.1] Federally Enforceable Through Title V Permit

28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

29. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit

30. The results of the measurements taken with the District approved analyzer shall be retained on-site at all times. [District Rule 1070] Federally Enforceable Through Title V Permit

31. This operation shall comply with the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

32. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type, quantity (cubic feet of gas or gallons of liquid) and sulfur content of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 2201 and 4702, 6.2.1] Federally Enforceable Through Title V Permit

33. All records shall be maintained, retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 4702, 6.2.1 and 6.2.2] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-124-2 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: SE26 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-15) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-124-2 : Feb 18 2010 1:25PM – ROEDERS : Joint Inspection NOT Required

6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from this IC engine shall not exceed any of the following limits: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District Rules 2201 and 4702, 5.1] Federally Enforceable Through Title V Permit
10. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The fuel consumption limit for this engine shall not exceed 241,600 scf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
13. If the IC engine is fired on PUC-regulated natural gas, the permittee shall retain on file, copies of all natural gas bills. [District Rule 2201] Federally Enforceable Through Title V Permit
14. If the engine is fired on non-PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the engine is fired on non-PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The permittee shall install and operate a nonresettable elapsed operating time meter. The elapsed operating time meter shall be properly maintained in accordance with the manufacturer's specifications. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
17. Source testing to measure the stack NOx, CO, and VOC emissions from this unit shall be conducted not less than once every twelve (12) months. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
20. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25A or 25B or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rule 4702, 6.4] Federally Enforceable Through Title V Permit
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. NOx, CO and VOC concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

22. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080] Federally Enforceable Through Title V Permit

23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit

24. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702, 6.5] Federally Enforceable Through Title V Permit

25. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.9] Federally Enforceable Through Title V Permit

26. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

27. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rule 4702, 5.6.1] Federally Enforceable Through Title V Permit

28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

29. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit

30. The results of the measurements taken with the District approved analyzer shall be retained on-site at all times. [District Rule 1070] Federally Enforceable Through Title V Permit

31. This operation shall comply with the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

32. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type, quantity (cubic feet of gas or gallons of liquid) and sulfur content of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 2201 and 4702, 6.2.1] Federally Enforceable Through Title V Permit

33. All records shall be maintained, retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 4702, 6.2.1 and 6.2.2] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-125-3 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 35 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-18) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

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DAVID WARNER, Director of Permit Services
S-2234-125-3 : Feb 18 2010 1:25PM -- ROEDERS : Joint Inspection NOT Required

6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from this IC engine shall not exceed any of the following limits: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District Rules 2201 and 4702, 5.1] Federally Enforceable Through Title V Permit
10. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The fuel consumption limit for this engine shall not exceed 241,600 scf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
13. If the IC engine is fired on PUC-regulated natural gas, the permittee shall retain on file, copies of all natural gas bills. [District Rule 2201] Federally Enforceable Through Title V Permit
14. If the engine is fired on non-PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the engine is fired on non-PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The permittee shall install and operate a nonresettable elapsed operating time meter. The elapsed operating time meter shall be properly maintained in accordance with the manufacturer's specifications. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
17. Source testing to measure the stack NOx, CO, and VOC emissions from this unit shall be conducted not less than once every twelve (12) months. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
20. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25A or 25B or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rule 4702, 6.4] Federally Enforceable Through Title V Permit
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. NOx, CO and VOC concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

22. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080] Federally Enforceable Through Title V Permit

23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit

24. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702, 6.5] Federally Enforceable Through Title V Permit

25. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.9] Federally Enforceable Through Title V Permit

26. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

27. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rule 4702, 5.6.1] Federally Enforceable Through Title V Permit

28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

29. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit

30. The results of the measurements taken with the District approved analyzer shall be retained on-site at all times. [District Rule 1070] Federally Enforceable Through Title V Permit

31. This operation shall comply with the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

32. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type, quantity (cubic feet of gas or gallons of liquid) and sulfur content of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 2201 and 4702, 6.2.1] Federally Enforceable Through Title V Permit

33. All records shall be maintained, retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 4702, 6.2.1 and 6.2.2] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-126-2 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 35 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-21) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

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DAVID WARNER, Director of Permit Services
S-2234-126-2 : Feb 18 2010 1:25PM – ROEDERS : Joint Inspection NOT Required

6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from this IC engine shall not exceed any of the following limits: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District Rules 2201 and 4702, 5.1] Federally Enforceable Through Title V Permit
10. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The fuel consumption limit for this engine shall not exceed 241,600 scf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
13. If the IC engine is fired on PUC-regulated natural gas, the permittee shall retain on file, copies of all natural gas bills. [District Rule 2201] Federally Enforceable Through Title V Permit
14. If the engine is fired on non-PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the engine is fired on non-PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The permittee shall install and operate a nonresettable elapsed operating time meter. The elapsed operating time meter shall be properly maintained in accordance with the manufacturer's specifications. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
17. Source testing to measure the stack NOx, CO, and VOC emissions from this unit shall be conducted not less than once every twelve (12) months. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
20. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25A or 25B or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rule 4702, 6.4] Federally Enforceable Through Title V Permit
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. NOx, CO and VOC concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

22. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080] Federally Enforceable Through Title V Permit

23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit

24. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702, 6.5] Federally Enforceable Through Title V Permit

25. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.9] Federally Enforceable Through Title V Permit

26. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

27. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rule 4702, 5.6.1] Federally Enforceable Through Title V Permit

28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

29. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit

30. The results of the measurements taken with the District approved analyzer shall be retained on-site at all times. [District Rule 1070] Federally Enforceable Through Title V Permit

31. This operation shall comply with the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

32. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type, quantity (cubic feet of gas or gallons of liquid) and sulfur content of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 2201 and 4702, 6.2.1] Federally Enforceable Through Title V Permit

33. All records shall be maintained, retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 4702, 6.2.1 and 6.2.2] Federally Enforceable Through Title V Permit

34. Authority to Construct (ATC) S-2234-126-0 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-127-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 26 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-25) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-127-1 : Feb 18 2010 1:25PM – ROEDERS : Joint Inspection NOT Required

6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from this IC engine shall not exceed any of the following limits: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District Rules 2201 and 4702, 5.1] Federally Enforceable Through Title V Permit
10. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The fuel consumption limit for this engine shall not exceed 241,600 scf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
13. If the IC engine is fired on PUC-regulated natural gas, the permittee shall retain on file, copies of all natural gas bills. [District Rule 2201] Federally Enforceable Through Title V Permit
14. If the engine is fired on non-PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the engine is fired on non-PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The permittee shall install and operate a nonresettable elapsed operating time meter. The elapsed operating time meter shall be properly maintained in accordance with the manufacturer's specifications. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
17. Source testing to measure the stack NOx, CO, and VOC emissions from this unit shall be conducted not less than once every twelve (12) months. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
20. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25A or 25B or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rule 4702, 6.4] Federally Enforceable Through Title V Permit
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. NOx, CO and VOC concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

22. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080] Federally Enforceable Through Title V Permit

23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit

24. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702, 6.5] Federally Enforceable Through Title V Permit

25. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.9] Federally Enforceable Through Title V Permit

26. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

27. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rule 4702, 5.6.1] Federally Enforceable Through Title V Permit

28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

29. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit

30. The results of the measurements taken with the District approved analyzer shall be retained on-site at all times. [District Rule 1070] Federally Enforceable Through Title V Permit

31. This operation shall comply with the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

32. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type, quantity (cubic feet of gas or gallons of liquid) and sulfur content of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 2201 and 4702, 6.2.1] Federally Enforceable Through Title V Permit

33. All records shall be maintained, retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 4702, 6.2.1 and 6.2.2] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-128-2 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 35 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-26) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

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DAVID WARNER, Director of Permit Services
S-2234-128-2 : Feb 18 2010 1:25PM – ROEDERS : Joint Inspection NOT Required

6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from this IC engine shall not exceed any of the following limits: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District Rules 2201 and 4702, 5.1] Federally Enforceable Through Title V Permit
10. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The fuel consumption limit for this engine shall not exceed 241,600 scf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
13. If the IC engine is fired on PUC-regulated natural gas, the permittee shall retain on file, copies of all natural gas bills. [District Rule 2201] Federally Enforceable Through Title V Permit
14. If the engine is fired on non-PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the engine is fired on non-PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The permittee shall install and operate a nonresettable elapsed operating time meter. The elapsed operating time meter shall be properly maintained in accordance with the manufacturer's specifications. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
17. Source testing to measure the stack NOx, CO, and VOC emissions from this unit shall be conducted not less than once every twelve (12) months. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
20. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25A or 25B or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rule 4702, 6.4] Federally Enforceable Through Title V Permit
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. NOx, CO and VOC concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

22. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080] Federally Enforceable Through Title V Permit

23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit

24. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702, 6.5] Federally Enforceable Through Title V Permit

25. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.9] Federally Enforceable Through Title V Permit

26. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

27. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rule 4702, 5.6.1] Federally Enforceable Through Title V Permit

28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

29. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit

30. The results of the measurements taken with the District approved analyzer shall be retained on-site at all times. [District Rule 1070] Federally Enforceable Through Title V Permit

31. This operation shall comply with the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

32. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type, quantity (cubic feet of gas or gallons of liquid) and sulfur content of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 2201 and 4702, 6.2.1] Federally Enforceable Through Title V Permit

33. All records shall be maintained, retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 4702, 6.2.1 and 6.2.2] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-129-2 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 29 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-27) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-129-2 : Feb 18 2010 1:25PM -- ROEDERS : Joint Inspection NOT Required

6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from this IC engine shall not exceed any of the following limits: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District Rules 2201 and 4702, 5.1] Federally Enforceable Through Title V Permit
10. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The fuel consumption limit for this engine shall not exceed 241,600 scf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
13. If the IC engine is fired on PUC-regulated natural gas, the permittee shall retain on file, copies of all natural gas bills. [District Rule 2201] Federally Enforceable Through Title V Permit
14. If the engine is fired on non-PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the engine is fired on non-PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The permittee shall install and operate a nonresettable elapsed operating time meter. The elapsed operating time meter shall be properly maintained in accordance with the manufacturer's specifications. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
17. Source testing to measure the stack NOx, CO, and VOC emissions from this unit shall be conducted not less than once every twelve (12) months. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
20. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25A or 25B or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rule 4702, 6.4] Federally Enforceable Through Title V Permit
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. NOx, CO and VOC concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

22. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080] Federally Enforceable Through Title V Permit

23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit

24. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702, 6.5] Federally Enforceable Through Title V Permit

25. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.9] Federally Enforceable Through Title V Permit

26. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

27. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rule 4702, 5.6.1] Federally Enforceable Through Title V Permit

28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

29. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit

30. The results of the measurements taken with the District approved analyzer shall be retained on-site at all times. [District Rule 1070] Federally Enforceable Through Title V Permit

31. This operation shall comply with the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

32. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type, quantity (cubic feet of gas or gallons of liquid) and sulfur content of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 2201 and 4702, 6.2.1] Federally Enforceable Through Title V Permit

33. All records shall be maintained, retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 4702, 6.2.1 and 6.2.2] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-130-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 29 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-28) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

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DAVID WARNER, Director of Permit Services
S-2234-130-1 : Feb 18 2010 1:25PM -- ROEDERS : Joint Inspection NOT Required

6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from this IC engine shall not exceed any of the following limits: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District Rules 2201 and 4702, 5.1] Federally Enforceable Through Title V Permit
10. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The fuel consumption limit for this engine shall not exceed 241,600 scf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
13. If the IC engine is fired on PUC-regulated natural gas, the permittee shall retain on file, copies of all natural gas bills. [District Rule 2201] Federally Enforceable Through Title V Permit
14. If the engine is fired on non-PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the engine is fired on non-PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The permittee shall install and operate a nonresettable elapsed operating time meter. The elapsed operating time meter shall be properly maintained in accordance with the manufacturer's specifications. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
17. Source testing to measure the stack NOx, CO, and VOC emissions from this unit shall be conducted not less than once every twelve (12) months. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
20. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25A or 25B or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rule 4702, 6.4] Federally Enforceable Through Title V Permit
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. NOx, CO and VOC concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

22. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080] Federally Enforceable Through Title V Permit

23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit

24. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702, 6.5] Federally Enforceable Through Title V Permit

25. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.9] Federally Enforceable Through Title V Permit

26. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

27. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rule 4702, 5.6.1] Federally Enforceable Through Title V Permit

28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

29. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit

30. The results of the measurements taken with the District approved analyzer shall be retained on-site at all times. [District Rule 1070] Federally Enforceable Through Title V Permit

31. This operation shall comply with the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

32. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type, quantity (cubic feet of gas or gallons of liquid) and sulfur content of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 2201 and 4702, 6.2.1] Federally Enforceable Through Title V Permit

33. All records shall be maintained, retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 4702, 6.2.1 and 6.2.2] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-131-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 33 **TOWNSHIP:** 30S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-29) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

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DAVID WARNER, Director of Permit Services
S-2234-131-1 : Feb 18 2010 1:25PM – ROEDERS : Joint Inspection NOT Required

6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from this IC engine shall not exceed any of the following limits: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District Rules 2201 and 4702, 5.1] Federally Enforceable Through Title V Permit
10. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The fuel consumption limit for this engine shall not exceed 241,600 scf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
13. If the IC engine is fired on PUC-regulated natural gas, the permittee shall retain on file, copies of all natural gas bills. [District Rule 2201] Federally Enforceable Through Title V Permit
14. If the engine is fired on non-PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the engine is fired on non-PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The permittee shall install and operate a nonresettable elapsed operating time meter. The elapsed operating time meter shall be properly maintained in accordance with the manufacturer's specifications. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
17. Source testing to measure the stack NOx, CO, and VOC emissions from this unit shall be conducted not less than once every twelve (12) months. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
20. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25A or 25B or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rule 4702, 6.4] Federally Enforceable Through Title V Permit
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. NOx, CO and VOC concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

22. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080] Federally Enforceable Through Title V Permit

23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit

24. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702, 6.5] Federally Enforceable Through Title V Permit

25. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.9] Federally Enforceable Through Title V Permit

26. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

27. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rule 4702, 5.6.1] Federally Enforceable Through Title V Permit

28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

29. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit

30. The results of the measurements taken with the District approved analyzer shall be retained on-site at all times. [District Rule 1070] Federally Enforceable Through Title V Permit

31. This operation shall comply with the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

32. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type, quantity (cubic feet of gas or gallons of liquid) and sulfur content of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 2201 and 4702, 6.2.1] Federally Enforceable Through Title V Permit

33. All records shall be maintained, retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 4702, 6.2.1 and 6.2.2] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-132-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 33 **TOWNSHIP:** 30S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-30) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

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DAVID WARNER, Director of Permit Services
S-2234-132-1 : Feb 18 2010 1:26PM – ROEDERS : Joint Inspection NOT Required

6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from this IC engine shall not exceed any of the following limits: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District Rules 2201 and 4702, 5.1] Federally Enforceable Through Title V Permit
10. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The fuel consumption limit for this engine shall not exceed 241,600 scf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
13. If the IC engine is fired on PUC-regulated natural gas, the permittee shall retain on file, copies of all natural gas bills. [District Rule 2201] Federally Enforceable Through Title V Permit
14. If the engine is fired on non-PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the engine is fired on non-PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The permittee shall install and operate a nonresettable elapsed operating time meter. The elapsed operating time meter shall be properly maintained in accordance with the manufacturer's specifications. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
17. Source testing to measure the stack NOx, CO, and VOC emissions from this unit shall be conducted not less than once every twelve (12) months. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
20. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25A or 25B or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rule 4702, 6.4] Federally Enforceable Through Title V Permit
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. NOx, CO and VOC concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

22. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080] Federally Enforceable Through Title V Permit

23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit

24. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702, 6.5] Federally Enforceable Through Title V Permit

25. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.9] Federally Enforceable Through Title V Permit

26. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

27. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rule 4702, 5.6.1] Federally Enforceable Through Title V Permit

28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

29. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit

30. The results of the measurements taken with the District approved analyzer shall be retained on-site at all times. [District Rule 1070] Federally Enforceable Through Title V Permit

31. This operation shall comply with the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

32. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type, quantity (cubic feet of gas or gallons of liquid) and sulfur content of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 2201 and 4702, 6.2.1] Federally Enforceable Through Title V Permit

33. All records shall be maintained, retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 4702, 6.2.1 and 6.2.2] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-133-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 31 **TOWNSHIP:** 30S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-31) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

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DAVID WARNER, Director of Permit Services
S-2234-133-1 : Feb 18 2010 1:26PM -- ROEDERS : Joint Inspection NOT Required

6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from this IC engine shall not exceed any of the following limits: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District Rules 2201 and 4702, 5.1] Federally Enforceable Through Title V Permit
10. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The fuel consumption limit for this engine shall not exceed 241,600 scf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
13. If the IC engine is fired on PUC-regulated natural gas, the permittee shall retain on file, copies of all natural gas bills. [District Rule 2201] Federally Enforceable Through Title V Permit
14. If the engine is fired on non-PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the engine is fired on non-PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The permittee shall install and operate a nonresettable elapsed operating time meter. The elapsed operating time meter shall be properly maintained in accordance with the manufacturer's specifications. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
17. Source testing to measure the stack NOx, CO, and VOC emissions from this unit shall be conducted not less than once every twelve (12) months. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
20. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25A or 25B or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rule 4702, 6.4] Federally Enforceable Through Title V Permit
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. NOx, CO and VOC concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit

DRAFT

CONDITIONS CONTINUE ON NEXT PAGE

22. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080] Federally Enforceable Through Title V Permit

23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit

24. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702, 6.5] Federally Enforceable Through Title V Permit

25. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.9] Federally Enforceable Through Title V Permit

26. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

27. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rule 4702, 5.6.1] Federally Enforceable Through Title V Permit

28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

29. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit

30. The results of the measurements taken with the District approved analyzer shall be retained on-site at all times. [District Rule 1070] Federally Enforceable Through Title V Permit

31. This operation shall comply with the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

32. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type, quantity (cubic feet of gas or gallons of liquid) and sulfur content of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 2201 and 4702, 6.2.1] Federally Enforceable Through Title V Permit

33. All records shall be maintained, retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 4702, 6.2.1 and 6.2.2] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-134-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 31 **TOWNSHIP:** 30S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-32) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-134-1 : Feb 18 2010 1:26PM -- ROEDERS : Joint Inspection NOT Required

6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from this IC engine shall not exceed any of the following limits: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District Rules 2201 and 4702, 5.1] Federally Enforceable Through Title V Permit
10. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The fuel consumption limit for this engine shall not exceed 241,600 scf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
13. If the IC engine is fired on PUC-regulated natural gas, the permittee shall retain on file, copies of all natural gas bills. [District Rule 2201] Federally Enforceable Through Title V Permit
14. If the engine is fired on non-PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the engine is fired on non-PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The permittee shall install and operate a nonresettable elapsed operating time meter. The elapsed operating time meter shall be properly maintained in accordance with the manufacturer's specifications. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
17. Source testing to measure the stack NOx, CO, and VOC emissions from this unit shall be conducted not less than once every twelve (12) months. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
20. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25A or 25B or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rule 4702, 6.4] Federally Enforceable Through Title V Permit
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. NOx, CO and VOC concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

22. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080] Federally Enforceable Through Title V Permit

23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit

24. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702, 6.5] Federally Enforceable Through Title V Permit

25. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.9] Federally Enforceable Through Title V Permit

26. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

27. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rule 4702, 5.6.1] Federally Enforceable Through Title V Permit

28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

29. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit

30. The results of the measurements taken with the District approved analyzer shall be retained on-site at all times. [District Rule 1070] Federally Enforceable Through Title V Permit

31. This operation shall comply with the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

32. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type, quantity (cubic feet of gas or gallons of liquid) and sulfur content of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 2201 and 4702, 6.2.1] Federally Enforceable Through Title V Permit

33. All records shall be maintained, retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 4702, 6.2.1 and 6.2.2] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-135-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 29 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-33) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

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DAVID WARNER, Director of Permit Services
S-2234-135-1 : Feb 18 2010 1:25PM -- ROEDERS : Joint Inspection NOT Required

6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from this IC engine shall not exceed any of the following limits: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District Rules 2201 and 4702, 5.1] Federally Enforceable Through Title V Permit
10. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The fuel consumption limit for this engine shall not exceed 241,600 scf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
13. If the IC engine is fired on PUC-regulated natural gas, the permittee shall retain on file, copies of all natural gas bills. [District Rule 2201] Federally Enforceable Through Title V Permit
14. If the engine is fired on non-PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the engine is fired on non-PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The permittee shall install and operate a nonresettable elapsed operating time meter. The elapsed operating time meter shall be properly maintained in accordance with the manufacturer's specifications. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
17. Source testing to measure the stack NOx, CO, and VOC emissions from this unit shall be conducted not less than once every twelve (12) months. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
20. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25A or 25B or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rule 4702, 6.4] Federally Enforceable Through Title V Permit
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. NOx, CO and VOC concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

22. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080] Federally Enforceable Through Title V Permit

23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit

24. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702, 6.5] Federally Enforceable Through Title V Permit

25. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.9] Federally Enforceable Through Title V Permit

26. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

27. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rule 4702, 5.6.1] Federally Enforceable Through Title V Permit

28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

29. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit

30. The results of the measurements taken with the District approved analyzer shall be retained on-site at all times. [District Rule 1070] Federally Enforceable Through Title V Permit

31. This operation shall comply with the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

32. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type, quantity (cubic feet of gas or gallons of liquid) and sulfur content of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 2201 and 4702, 6.2.1] Federally Enforceable Through Title V Permit

33. All records shall be maintained, retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 4702, 6.2.1 and 6.2.2] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-136-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 29 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-34) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

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DAVID WARNER, Director of Permit Services
S-2234-136-1 : Feb 18 2010 1:26PM -- ROEDERS : Joint Inspection NOT Required

6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from this IC engine shall not exceed any of the following limits: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District Rules 2201 and 4702, 5.1] Federally Enforceable Through Title V Permit
10. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The fuel consumption limit for this engine shall not exceed 241,600 scf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
13. If the IC engine is fired on PUC-regulated natural gas, the permittee shall retain on file, copies of all natural gas bills. [District Rule 2201] Federally Enforceable Through Title V Permit
14. If the engine is fired on non-PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the engine is fired on non-PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The permittee shall install and operate a nonresettable elapsed operating time meter. The elapsed operating time meter shall be properly maintained in accordance with the manufacturer's specifications. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
17. Source testing to measure the stack NOx, CO, and VOC emissions from this unit shall be conducted not less than once every twelve (12) months. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
20. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25A or 25B or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rule 4702, 6.4] Federally Enforceable Through Title V Permit
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. NOx, CO and VOC concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

22. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080] Federally Enforceable Through Title V Permit

23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit

24. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702, 6.5] Federally Enforceable Through Title V Permit

25. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.9] Federally Enforceable Through Title V Permit

26. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

27. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rule 4702, 5.6.1] Federally Enforceable Through Title V Permit

28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

29. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit

30. The results of the measurements taken with the District approved analyzer shall be retained on-site at all times. [District Rule 1070] Federally Enforceable Through Title V Permit

31. This operation shall comply with the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

32. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type, quantity (cubic feet of gas or gallons of liquid) and sulfur content of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 2201 and 4702, 6.2.1] Federally Enforceable Through Title V Permit

33. All records shall be maintained, retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 4702, 6.2.1 and 6.2.2] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-137-2 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 35 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 1834 HP NATURAL GAS-FIRED WAUKESHA IC ENGINE MODEL #7042 DRIVING A GAS COMPRESSOR (R-35) EQUIPPED WITH NON-SELECTIVE CATALYTIC REDUCTION, AIR/FUEL RATIO CONTROLLER, POSITIVE CRANKCASE VENTILATION, AND OPERATES AT VARIOUS UNSPECIFIED LOCATIONS WITHIN FACILITY S-2234: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

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DAVID WARNER, Director of Permit Services
S-2234-137-2 : Feb 18 2010 1:28PM – ROEDERS : Joint Inspection NOT Required

6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. IC engine shall be equipped with air/fuel ratio controller which readily indicates air/fuel ratio setting within tolerance limits as recommended by the catalyst system supplier. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The engine shall be equipped with a positive crankcase ventilation (PCV) system or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from this IC engine shall not exceed any of the following limits: NOx (as NO2) - 5 ppmv @ 15% O2, VOC - 25 ppmv @ 15% O2, CO - 56 ppmv @ 15% O2, PM10 - 0.02 g/hp-hr, or SOx (as SO2) - 0.011 g/hp-hr. [District Rules 2201 and 4702, 5.1] Federally Enforceable Through Title V Permit
10. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The fuel consumption limit for this engine shall not exceed 241,600 scf/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The engine shall only burn natural gas with fuel gas sulfur concentration (as H2S) not exceeding 1.0 grains/100 dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
13. If the IC engine is fired on PUC-regulated natural gas, the permittee shall retain on file, copies of all natural gas bills. [District Rule 2201] Federally Enforceable Through Title V Permit
14. If the engine is fired on non-PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the IC engine shall be determined using ASTM method D 1072, D 3031, D 4084, D 3246 or double GC. [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the engine is fired on non-PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The permittee shall install and operate a nonresettable elapsed operating time meter. The elapsed operating time meter shall be properly maintained in accordance with the manufacturer's specifications. [District Rule 4702, 5.6.6] Federally Enforceable Through Title V Permit
17. Source testing to measure the stack NOx, CO, and VOC emissions from this unit shall be conducted not less than once every twelve (12) months. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
20. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, VOC (ppmv) - EPA Method 25A or 25B or EPA Method 18 referenced as methane, ASTM D3246 or double GC for H2S and mercaptans, and EPA Method 21 for fugitive components. [District Rule 4702, 6.4] Federally Enforceable Through Title V Permit
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. NOx, CO and VOC concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rule 4702, 6.3.3] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

22. Source testing shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1080] Federally Enforceable Through Title V Permit

23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1080] Federally Enforceable Through Title V Permit

24. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702, 6.5] Federally Enforceable Through Title V Permit

25. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702, 6.5.9] Federally Enforceable Through Title V Permit

26. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every calendar quarter using a portable emission monitor that meets District specifications. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

27. If the NOx or CO concentrations corrected to 15% O2, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall immediately notify the District, and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing by this condition. [District Rule 4702, 5.6.1] Federally Enforceable Through Title V Permit

28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4702, 5.6.1 and 5.6.9] Federally Enforceable Through Title V Permit

29. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 15% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4702, 6.2.1] Federally Enforceable Through Title V Permit

30. The results of the measurements taken with the District approved analyzer shall be retained on-site at all times. [District Rule 1070] Federally Enforceable Through Title V Permit

31. This operation shall comply with the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

32. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type, quantity (cubic feet of gas or gallons of liquid) and sulfur content of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rules 2201 and 4702, 6.2.1] Federally Enforceable Through Title V Permit

33. All records shall be maintained, retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2201 and 4702, 6.2.1 and 6.2.2] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-139-2 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 28 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (R-23) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

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DAVID WARNER, Director of Permit Services
S-2234-139-2 : Feb 16 2010 1:28PM – ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-139-1 shall be implemented prior to implementation of this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-140-2 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 28 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (R-24) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-140-2 : Feb 16 2010 1:26PM -- ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-140-1 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-141-2 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 03 **TOWNSHIP:** 31S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-95) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-141-2 : Feb 18 2010 1:26PM -- ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-141-1 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-142-2 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 26 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-103) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-142-2 : Feb 18 2010 1:26PM -- ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-142-1 shall be implemented prior to implementation of this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-143-2 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 27 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-104) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-143-2, Feb 18 2010 1:27PM – ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-143-1 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-144-2 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 36 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-105) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-144-2 : Feb 18 2010 1:27PM – ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-144-1 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-145-2 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 25 **TOWNSHIP:** 30S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-106) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-145-2 : Feb 18 2010 1:27PM – ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-145-1 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-147-2 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 17 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-108] AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-147-2 : Feb 18 2010 1:27PM -- ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-147-1 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-150-2 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 03 **TOWNSHIP:** 31S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-109) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-150-2 : Feb 18 2010 1:27PM – ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-150-1 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-151-2 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 03 **TOWNSHIP:** 31S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-110) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-151-2 : Feb 18 2010 1:27PM -- ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-151-1 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-152-2 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 03 **TOWNSHIP:** 31S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-111) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-152-2 : Feb 16 2010 1:27PM -- ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-152-1 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-153-2 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 03 **TOWNSHIP:** 31S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-112) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-153-2 : Feb 18 2010 1:27PM – ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit

7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit

8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit

9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

10. Authority to Construct (ATC) S-2234-153-1 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-154-2 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 03 **TOWNSHIP:** 31S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-113) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-154-2 : Feb 18 2010 1:27PM – ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-154-1 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-157-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 06 **TOWNSHIP:** 31S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-114) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-157-1 : Feb 18 2010 1:27PM -- ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-157-0 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-158-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 29 **TOWNSHIP:** 30S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-115) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-158-1 : Feb 18 2010 1:28PM -- ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-158-0 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-159-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 04 **TOWNSHIP:** 31S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-116) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-159-1 : Feb 18 2010 1:28PM -- ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-159-0 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-160-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 09 **TOWNSHIP:** 31S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-117) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-160-1 : Feb 18 2010 1:26PM – ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-160-0 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-161-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 10 **TOWNSHIP:** 31S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-118) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-161-1 : Feb 18 2010 1:28PM -- ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-161-0 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-162-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 34 **TOWNSHIP:** 30S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-119) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-162-1 : Feb 18 2010 1:28PM -- ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-161-0 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-163-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 35 **TOWNSHIP:** 30S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-120) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

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DAVID WARNER, Director of Permit Services
S-2234-163-1 : Feb 18 2010 1:28PM – ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-163-0 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-164-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 36 **TOWNSHIP:** 30S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-121) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-164-1 : Feb 18 2010 1:28PM – ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-164-0 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-165-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 12 **TOWNSHIP:** 31S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-122) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-165-1 : Feb 18 2010 1:28PM – ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-165-0 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-166-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 31 **TOWNSHIP:** 30S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-123) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-166-1 : Feb 18 2010 1:28PM -- ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-166-0 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-167-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 31 **TOWNSHIP:** 30S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-124) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-167-1 : Feb 18 2010 1:28PM – ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-167-1 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-172-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 3 **TOWNSHIP:** 31S **RANGE:** 24E

EQUIPMENT DESCRIPTION:
MODIFICATION OF GLYCOL DEHYDRATION OPERATION INCLUDING 1.5 MMBTU/HR BURNER, A GLYCOL SURGE TANK, FLASH VESSEL AND GLYCOL REBOILER VENT, A LEAN/RICH GLYCOL EXCHANGER, AND VARIOUS PUMPS AND FILTERS WITH PROCESS VENT CONNECTED TO VACUUM GAS GATHERING SYSTEM: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Glycol reboiler heater shall be fired on natural gas containing no more than 0.75 gr S/100 scf and no more than 5% by weight hydrocarbons heavier that butane. [District Rule 2020] Federally Enforceable Through Title V Permit
4. Only glycol shall be used as the dehydration medium. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Flash tank and dehydrator vent shall be vented to gas gathering system. [District Rules 2201 and 4408] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-172-1 : Feb 18 2010 1:28PM – ROEDERS : Joint Inspection NOT Required

6. Condensate handling shall be conducted in closed systems resulting in fugitive component emissions only. [District Rule] Federally Enforceable Through Title V Permit
7. The glycol dehydration system shall not be operated unless all vapors are directed to the vapor recovery system, a fuel gas system or a sales gas system, or a system in which VOC emissions are combusted by a flare, incinerator, reboiler, or thermal oxidizer. [District Rule 4408, 5.1] Federally Enforceable Through Title V Permit
8. The condensed hydrocarbon liquid stream from the glycol dehydration vent shall be stored and handled in a manner that will not cause or allow evaporation of VOC to the atmosphere. [District Rule 4408, 5.2] Federally Enforceable Through Title V Permit
9. A leak is defined as the dripping at a rate of more than three (3) drops per minute of liquid containing VOCs or a reading as methane in excess of 10,000 ppm above background when measured at a distance of one (1) centimeter from the potential source in accordance with EPA Method 21. [District Rule 4408, 3.8.1] Federally Enforceable Through Title V Permit
10. All control systems shall be maintained in a leak-free condition as determined by EPA Method 21. [District Rule 4408, 5.3] Federally Enforceable Through Title V Permit
11. VOC control efficiency shall be no less than 95% by weight. [District Rule 4408, 5.1] Federally Enforceable Through Title V Permit
12. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.6 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. This operation shall comply with the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
14. The operator shall maintain monthly records of the amount of gas dehydrated (MMSCF). [District Rule 4408, 6.1.1] Federally Enforceable Through Title V Permit
15. The operator of any glycol dehydration system shall maintain the following records: facility name and APCD permit number; description of any installed VOC control system; flow diagram of dehydrator and any VOC controls; and maintenance records of the VOC control system. [District Rule 4408, 6.1.2] Federally Enforceable Through Title V Permit
16. The records listed in Sections 6.1.1, 6.1.2, and 6.1.3 shall be retained on the premises for a period of not less than five years and made available to any District representative upon request. [District Rule 4408, 6.1] Federally Enforceable Through Title V Permit
17. Authority to Construct (ATC) S-2234-172-0 shall be implemented prior to the implementation of this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-175-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 35 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF GAS DEHYDRATION SYSTEM INCLUDING; INLET GAS COALESCERS, MOLECULAR SIEVE DRYER BEDS, REGENERATION AND DRY GAS COOLERS, AND ELECTRIC MOTOR REGENERATION GAS COMPRESSOR (35R GAS PLANT): DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 1.9 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. There shall be no leaks exceeding 10,000 ppmv VOCs. [District Rule 2201] 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

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DAVID WARNER, Director of Permit Services
S-2234-175-1 : Feb 18 2010 1:29PM – ROEDERS : Joint Inspection NOT Required

5. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4309] Federally Enforceable Through Title V Permit

6. Equipment that is in vacuum service is exempt from the control and monitoring requirements and work practice standards of District Rule 4409 and applicable NSPS requirements, provided the equipment is identified as such in the Operator Management Plan. [District Rule District Rule 4409, 4.2.8 and 40 CFR 60.482-1(d)] Federally Enforceable Through Title V Permit

7. For determining compliance with applicable NSPS requirements, the test methods and procedures at 40 CFR 60.485 shall be used. Alternative test methods may be used subject to approval pursuant to 40 CFR 60.8. [40 CFR 60.8, 40 CFR 60.485] Federally Enforceable Through Title V Permit

8. For all components that are subject to applicable NSPS requirements and are included in the permit unit addendum to the operator management plan and that comply with the applicable NSPS inspection, maintenance and repair requirements as specified by the terms and condition of this permit, a Title-V permit shield is granted for applicable requirements at 40 CFR 60, Subpart KKK. [District Rule 40 CFR 60, Subpart KKK] Federally Enforceable Through Title V Permit

9. If a vapor collection system or closed vent system is operated under a vacuum, it is exempt from the inspection requirements as specified in this permit unit. [District Rule 4409, 4.2.8 and 40 CFR 60.482-10(i)] Federally Enforceable Through Title V Permit

10. For open ended lines and open ended valves, subject to applicable NSPS, each open-ended valve or line shall be sealed with two (2) valves, a blind flange, a cap, or a plug at all times, except during operations requiring process fluid flow through the valve or line. Open ended lines and valves designed to open automatically in the event of an emergency are exempt from this requirement [40 CFR 60.482-6(a) and 40 CFR 60.482-6(d)] Federally Enforceable Through Title V Permit

11. For valves subject to applicable new source performance standards (NSPS), any valve in gas/vapor service or light liquid service that is designated in the Operator Management Plan as an unsafe-to-monitor valve is exempt from the monthly NSPS leak inspection requirements, provided: 1) the owner/operator demonstrates the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence, and 2) a written plan is adhered to that requires monitoring of the valve as frequently as practicable during safe-to-monitor times and at least annually and during shutdown. [40 CFR 60.482-7(g)] Federally Enforceable Through Title V Permit

12. For valves subject to applicable NSPS, any valve in gas/vapor service or light liquid service that is designated in the Operator Management Plan as a difficult-to-monitor (inaccessible) valve is exempt from the monthly NSPS leak inspection requirements, provided: 1) the owner/operator demonstrates the valve cannot be monitored without elevating the monitoring personnel more than 15 feet above a support surface, or that it is over 6 feet away from a platform , 2) the process unit within which the valve is located either becomes an affected facility through 40 CFR 60.14 or 60.15 or if the owner/operator designates less than 3.0% of the total number of valves as difficult-to-monitor, and 3) a written plan is adhered to that, requires monitoring of the valve at least annually and during shutdown. [40 CFR 60.482-7(h)] Federally Enforceable Through Title V Permit

13. Any components of the closed vent system that are designated as unsafe to inspect are exempt from the inspection requirements specified in this permit unit if the owner or operator complies with the following: 1) the owner or operator determines that the equipment is unsafe to inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying with the inspection requirements; 2) the owner or operator identifies the components in the Operator Management Plan; 3) the owner or operator has a written plan that requires inspection of the equipment as frequently as practicable during safe-to-inspect times; and 4) inspection and required repair of the components is performed at least annually and during shutdown. [District Rule 4409, 5.3.7.5 and 40 CFR 60.482-10(j)] Federally Enforceable Through Title V Permit

14. For components subject to applicable NSPS, when a leak is detected, a weatherproof and readily visible tag shall be attached, bearing the equipment identification number and date which the leak is detected. The tag on a valve shall remain in place until after it has been monitored for 2 successive months and no leak has been detected. The tag on all other equipment may be removed after repair and re-inspection document compliance with the applicable NSPS. [40 CFR 60.486(b) and 60.635(b)(1)] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

15. Any leaking component and any leak shall be repaired to a leak-free condition and reinspected within 15 calendar days. [40 CFR 60.482-7] Federally Enforceable Through Title V Permit

16. For components subject to applicable NSPS standards, except as otherwise provided by 40 CFR 60.482-9, any component leak shall be repaired to a leak-free condition, or vented to a flare satisfying the requirements of 40 CFR 60.18, or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 or EPA Method 18 within fifteen (15) calendar days of detection. A first attempt at repair shall be made no later than 5 calendar days after leak detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates necessary and sufficient actions are being taken to correct the leak within this time period. [40 CFR 60.482-2(c)(1) and (c)(2), 60.482-3(g), 60.482-7(d), 60.482-8(c), and 60.633(b)(3)] Federally Enforceable Through Title V Permit

17. For components subject to applicable NSPS, if the leaking component is an essential part of a critical process identified in the operator management plan and which cannot be immediately shut down for repairs, the operator shall minimize the leak within 15 calendar days. If the leak which has been minimized still exceeds the applicable NSPS standard, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than six months from the date of the original leak detection for pumps and one year from the date of the original leak detection for other components. Delay of repair is allowed for equipment which is isolated from the process and which does not remain in VOC service and delay of repair is is allowed pursuant to 40 CFR 60.482-2(c)(1), 40 CFR 60.482-3(g)(1), 40 CFR 60.482-4(b)(1), 40 CFR 60.482-7(d)(1),40 CFR 60.482-8(c)(1) [40 CFR 60.482- 2(c)(1). [40 CFR 40 CFR 60.482-3(g)(1), 40 CFR 60.482-4(b)(1), 40 CFR 60.482-7(d)(1),40 CFR 60.482-8(c)(1), 60.482-9(a) and (b)] Federally Enforceable Through Title V Permit

18. Delay of repair of a closed vent system for which leaks have been detected is allowed if the closed vent system is an essential part of a critical process identified in the operator management plan which cannot be immediately shut down for repairs or if the owner or operator determines that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair. However the operator shall minimize the leak within 15 calendar days. If the leak which has been minimized still exceeds the limit in this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. [40 CFR 60.482-9] Federally Enforceable Through Title V Permit

19. For the purpose of determining compliance with applicable NSPS, each operator shall maintain an inspection log for the components subject to NSPS inspection requirements that contains the following information: 1) instrument, operator, and equipment identification numbers; 2) date of leak detection; 3) dates and repair method of each attempt to repair the leak; 4) "above 10,000" if the maximum instrument reading after each repair attempt is equal to or greater than 10,000 ppm; 5) "repair delayed", reason for delay, signature of individual whose decision it was that repair could not be effected without a process shutdown, and expected date of successful repair if a leak is not repaired within 15 days of detection; 6) dates of process unit shutdown that occur while the equipment is unrepaired; 7) date of successful repair and emission level of recheck after leak is repaired. [District Rule 40 CFR 60.486(c) and 60.635(2)(i) through (ix)] Federally Enforceable Through Title V Permit

20. Each piece of equipment subject to requirements of this permit is presumed to be in VOC service or in wet gas service unless an owner or operator demonstrates that the piece of equipment is not in VOC service or in wet gas service. For a piece of equipment to be considered not in VOC service, it must be determined that the VOC content can be reasonably expected never to exceed 10.0 percent by weight. For a piece of equipment to be considered in wet gas service, it must be determined that it contains or contacts the field gas before the extraction step in the process. For purposes of determining the percent VOC content of the process fluid that is contained in or contacts a piece of equipment, procedures that conform to the methods described this permit shall be used. [40 CFR 60.485(d) and 60.632(f)] Federally Enforceable Through Title V Permit

21. Compliance the no detectable emission standards for this permit unit shall be determined as follows: 1) EPA Method 21 shall be followed, 2) Method 21 shall be used to determine the background level and all potential leak interfaces shall be traversed as close to the inter face as possible, and 3) the arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 500 ppm to determine compliance. [40 CFR 60.485(c)] Federally Enforceable Through Title V Permit

22. For valves subject to applicable NSPS, if the operator elects to comply with the allowable percentage of leaking valves then for this permit unit, the operator shall notify the APCO 90 days before implementing these alternatives. [40 CFR 60.483-1(b)(1) and (d), 60. 483-2(a)(2), and 60.487(d)] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

23. For valves subject to applicable NSPS, if the allowable percentage of leaking valves is selected, then a performance test shall be conducted initially upon designation for allowable percentage of leaking valves, annually, and at other times requested by the APCO. The performance test shall be conducted as follows: 1) all valves in gas/vapor and light liquid service shall be monitored within 1 week using EPA Method 21 and 2) the leak percentage shall be determined by dividing the number of leaking valves detected and valves for which repair has been delayed by the number of valves in gas/vapor and light liquid service in this permit unit, 3) a record must be kept of the percent of valves found leaking during each leak detection period. [40 CFR 60.483-1(b)(2) and (c) and 60. 483-2(b)(5) and (6)] Federally Enforceable Through Title V Permit

24. For compressors subject to applicable NSPS, each compressor shall meet the applicable control system requirements of 40 CFR 482-3(a) - (i), except as otherwise provided by 40 CFR 60.482-1(c) and 40 CFR 60.482-3(h) and (i). [40 CFR 60.482-3(a) through (j)], 40 CFR 60.482-1(c), 40 CFR 60.482-3(h) and (i), and 40 CFR 60.633] Federally Enforceable Through Title V Permit

25. Compressors that are subject to applicable NSPS, are exempt from requirements of 40 CFR 60.482-3(a) and 40 CFR 60.482-3(b) if the compressor is equipped with a closed vent system to capture and transport leakage from the compressor drive shaft back to a process fuel gas system or a control device. Closed vent systems piping shall comply with applicable requirements at 40 CFR 60.482-10. Closed vent vapor recovery systems shall comply with design requirements at 40 CFR 60.482-10(b). Enclosed combustion devices used by closed vent system shall comply with design requirements at 40 CFR 60.482-10(c). Flares used by closed vent systems shall comply with requirements at 40 CFR 60.482-10(d). Closed vent system control devices shall comply with monitoring requirements at 40 CFR 60.482-10(e). [40 CFR 60 .482-3, 40 CFR 60.482-10] Federally Enforceable Through Title V Permit

26. Compressors that are subject to applicable NSPS and are designated in the Operator Management Plan for no detectable leak emission, as indicated by an instrument reading of less than 500 ppm above background, is are exempt from the requirements of 40 CFR 482-3(a)-(h), provided the compressor is tested for compliance with no detectable emissions initially upon designation, annually, and at other times requested by the APCO. [40 CFR 60.482-3(i)] Federally Enforceable Through Title V Permit

27. When determining compliance with applicable NSPS, if an instrument reading of 10,000 ppm or greater is measured, a leak is detected. [40 CFR 60.633(b)(2), 40482-7(a), (b), and (c] Federally Enforceable Through Title V Permit

28. For open ended lines or valves subject to applicable NSPS, each open-ended valve or line equipped with a second valve shall be operated so that the valve on the process fluid end is closed before the second valve is closed. [40 CFR 60.482-6(b)] Federally Enforceable Through Title V Permit

29. For equipment subject to applicable NSPS when a double block-and-bleed system is being used, the bleed valve or line may remain open only during operations that require venting the line between the block valves. [40 CFR 60.482-6(c)] Federally Enforceable Through Title V Permit

30. Except as provided by applicable NSPS, valves that are subject to NSPS that are in gas/vapor service or light liquid service shall be monitored monthly to detect leaks using EPA Method 21. Any valve for which a leak is not detected for 2 successive months may be monitored the first month of every quarter. If a leak is subsequently detected, monitoring shall revert to monthly. [40 CFR 60.482-7(a), (b), and (c)] Federally Enforceable Through Title V Permit

31. Any valve in gas/vapor service or light liquid service that is designated in the equipment log list for no detectable leak emission, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the monitoring requirements of 40 CFR 60.482-7(a), provided the valve: 1) has no external actuating mechanism in contact with the process fluid and 2) is tested for and meets compliance with no detectable leak emission initially upon designation, annually and at other times requested by the APCO. [40 CFR 60.482-7(f)] Federally Enforceable Through Title V Permit

32. For valves subject to applicable NSPS requirements, for a valve in gas/vapor service or light or heavy liquid service, first attempts at repair shall include the following where practicable: 1) tightening of bonnet bolts, 2) replacement of bonnet bolts, 3) tightening of packing gland nuts, and 4) injection of lubricant into lubricant packing. [40 CFR 60.482-7(e) and 60.482-8(d)] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

33. For pumps and valves in heavy liquid service, pressure relief devices in light or heavy liquid service, and flanges and other connectors, that are subject to applicable NSPS requirements, if evidence of a potential leak is found by sight, sound, smell, or any other detection method then the device shall be monitored within 5 days for leak detection in accordance with EPA Method 21. A leak is detected if an instrument reading of 10,000 ppm or greater is measured. [40 CFR 60.482-8(a) and (b)] Federally Enforceable Through Title V Permit

34. In addition to the information required by Rule 4409, the operator management plan shall include an addendum for this permit unit containing the following applicable NSPS information: 1) list of identification numbers for equipment subject to the applicable NSPS requirements, 2) list of identification numbers for equipment which is designated for no detectable emissions and which is signed by the owner/operator, 3) list of equipment identification numbers for pressure relief devices which must be operated with no detectable emissions, 4) dates of each compliance test for emissions below 500 ppm, for all equipment subject to this no detectable emission limit and the background level measured and the maximum instrument reading measured at the equipment, during each test, and 5) list of identification numbers for equipment in vacuum service. [40 CFR 60.486(e) and 60.635(b)(2)(x)] Federally Enforceable Through Title V Permit

35. In addition to the information required by Rule 4409, the operator management plan shall include an addendum for this permit unit containing the following applicable NSPS information: for valves in gas/vapor service and light liquid service: 1) a list of identification numbers for valves designated "unsafe-to-monitor" and for valves designated "difficult-to monitor", 2) an explanation for each valve stating why it is so designated, and 3) the schedule for monitoring each such valve. [40 CFR 60.486(f)] Federally Enforceable Through Title V Permit

36. For valves subject to NSPS annual leak detection alternative requirements, the NSPS inspection log shall include the following information: 1) a schedule of monitoring and 2) the percent of valves found leaking during each monitoring period. [CFR 60.486(g)] Federally Enforceable Through Title V Permit

37. A log containing the following information for pumps and compressors equipped a barrier fluid seal system which includes a seal failure sensor, for which a system failure criteria is required to be established, pursuant to the requirements for this permit unit, shall be maintained and kept in a readily accessible location: 1) the design criterion required by this permit and an explanation and 2) any changes to this criterion and reasons for the changes. [40 CFR 60.486(h)] Federally Enforceable Through Title V Permit

38. For equipment (compressors and components) subject to applicable NSPS, the operator shall maintain information and data used to demonstrate that a piece of equipment is not in VOC service and information and data used to demonstrate that a reciprocating compressor is in wet gas service. The information shall be included in the NSPS inspection log for the permit unit and shall be kept in a readily accessible location. [40 CFR 60.486(j) and 60.635(c)] Federally Enforceable Through Title V Permit

39. Vapor recovery systems (for example, condensers and absorbers) shall be designed and operated to recover the VOC emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 parts per million by volume, whichever is less stringent. [40 CFR 60.482-10(b)] Federally Enforceable Through Title V Permit

40. Enclosed combustion devices shall be designed and operated to reduce the VOC emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 parts per million by volume, on a dry basis, corrected to 3 percent oxygen, whichever is less stringent or to provide a minimum residence time of 0.75 seconds at a minimum temperature of 816 °C. [40 CFR 60.482-10(c)] Federally Enforceable Through Title V Permit

41. If the vapor collection system or closed vent system is constructed of hard-piping, the owner or operator shall conduct an initial inspection according to the procedures specified in EPA Method 21 using the calibration gases as specified in the requirements for this permit unit. The owner or operator shall also conduct annual visual inspections for visible, audible, or olfactory indications of leaks. [40 CFR 60.482-10(f)(1) and 40 CFR 60.485(b)] Federally Enforceable Through Title V Permit

42. If the vapor collection system or closed vent system is constructed of ductwork, the owner or operator shall conduct an initial inspection and annual inspections according to the procedures specified in EPA Method 21 using the calibration gases as specified in the requirements for this permit unit. The owner or operator shall also conduct annual visual inspections for visible, audible, or olfactory indications of leaks. [40 CFR 60.482-10(f)(2) and 40 CFR 60.485(b)] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

43. Any parts of the closed vent system that are designated as difficult to inspect are exempt from the inspection requirements of 40 CFR 60.482-10(f)(1) and (f)(2) if the owner or operator complies with the following: 1) the owner or operator determines that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters above a support surface; and 2) the process unit within which the closed vent system is located becomes an affected facility through modification or reconstruction, as defined in 40 CFR 60.14 and 60.15, or the owner or operator designates less than 3.0 percent of the total number of closed vent system equipment as difficult to inspect; and 3) the owner or operator has a written plan that requires inspection of the equipment at least every 5 years. A closed vent system is exempt from inspection if it is operated under a vacuum. [40 CFR 60.482-10(k)] Federally Enforceable Through Title V Permit

44. Closed vent systems and control devices shall be operated at all times when emissions may be vented to them. [40 CFR 60.482-10(m)] Federally Enforceable Through Title V Permit

45. A log shall be maintained containing the following information: 1) identification of all parts of the closed vent system that are designated as unsafe to inspect, an explanation of why the equipment is unsafe to inspect, and the plan for inspecting the equipment; 2) identification of all parts of the closed vent system that are designated as difficult to inspect, an explanation of why the equipment is difficult to inspect, and the plan for inspecting the equipment; 3) for each inspection conducted in accordance with EPA Method 21 during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected; and 4) for each visual inspection conducted for visible, audible, or olfactory indications of leaks during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected. [40 CFR 60.482-10(l) and 40 CFR 60.485(b)] Federally Enforceable Through Title V Permit

46. For components subject to applicable NSPS requirements, semiannual reports shall be submitted to the APCO containing the following information: 1) process unit identification, 2) for each month during the reporting period, number of valves, pumps, compressors, and pressure relief devices for which leaks were detected; number of valves, pumps, compressors, and pressure relief devices for which leaks were not repaired within 15 days and a first attempt not made within 5 days of leak detection; the facts that explain each delay of repair and, where appropriate, why a process unit shutdown was technically infeasible 3) dates of process unit shutdowns which occurred within the reporting period, and 4) revisions to items reported in the initial or subsequent semiannual reports. [40 CFR 60.487(a) and (c) and 60.636(c)] Federally Enforceable Through Title V Permit

47. Prior to operating equipment under this Authority to Construct, the permittee shall surrender VOC emission reduction credits in the following quantities: 1st quarter - 86 lb, 2nd quarter - 86 lb, 3rd quarter - 86 lb, and 4th quarter - 87 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06) [District Rule 2201] Federally Enforceable Through Title V Permit

48. ERC Certificate Number S-2822-1 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, at which time this Authority to Construct shall be administratively reissued, specifying the new offsetting proposal. [District Rule 2201] Federally Enforceable Through Title V Permit

49. Authority to Construct (ATC) S-2234-175-0 shall be implemented prior to the implementation of this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-176-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 35 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF NATURAL GAS CO2 REMOVAL SYSTEM INCLUDING; MOLECULAR SIEVE CO2 REMOVAL BEDS, FIN-FAN GAS COOLERS, NITROGEN DRYING BEDS, LIQUID KNOCKOUT VESSELS AND ELECTRIC MOTOR CO2 REMOVAL COMPRESSOR(S) (35R GAS PLANT): DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.5 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. There shall be no leaks exceeding 10,000 ppmv VOCs. [District Rule 2201] 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

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DAVID WARNER, Director of Permit Services
S-2234-176-1 : Feb 18 2010 1:29PM – ROEDERS : Joint Inspection NOT Required

5. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit

6. Equipment that is in vacuum service is exempt from the control and monitoring requirements and work practice standards of District Rule 4409 and applicable NSPS requirements, provided the equipment is identified as such in the Operator Management Plan. [District Rule District Rule 4409, 4.2.8 and 40 CFR 60.482-1(d)] Federally Enforceable Through Title V Permit

7. For determining compliance with applicable NSPS requirements, the test methods and procedures at 40 CFR 60.485 shall be used. Alternative test methods may be used subject to approval pursuant to 40 CFR 60.8. [40 CFR 60.8, 40 CFR 60.485] Federally Enforceable Through Title V Permit

8. For all components that are subject to applicable requirements of District Rule 4409 and are included in the operator management plan and that comply with the inspection, maintenance and repair requirements as specified by Rule 4409, a Title-V permit shield for applicable Rule 4409 requirements is granted. [District Rule 4409] Federally Enforceable Through Title V Permit

9. For all components that are subject to applicable NSPS requirements and are included in the permit unit addendum to the operator management plan and that comply with the applicable NSPS inspection, maintenance and repair requirements as specified by the terms and condition of this permit, a Title-V permit shield is granted for applicable requirements at 40 CFR 60, Subpart KKK. [District Rule 40 CFR 60, Subpart KKK] Federally Enforceable Through Title V Permit

10. If a vapor collection system or closed vent system is operated under a vacuum, it is exempt from the inspection requirements as specified in this permit unit. [District Rule 4409, 4.2.8 and 40 CFR 60.482-10(i)] Federally Enforceable Through Title V Permit

11. For open ended lines and open ended valves, subject to applicable NSPS, each open-ended valve or line shall be sealed with two (2) valves, a blind flange, a cap, or a plug at all times, except during operations requiring process fluid flow through the valve or line. Open ended lines and valves designed to open automatically in the event of an emergency are exempt from this requirement [40 CFR 60.482-6(a) and 40 CFR 60.482-6(d)] Federally Enforceable Through Title V Permit

12. For valves subject to applicable new source performance standards (NSPS), any valve in gas/vapor service or light liquid service that is designated in the Operator Management Plan as an unsafe-to-monitor valve is exempt from the monthly NSPS leak inspection requirements, provided: 1) the owner/operator demonstrates the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence, and 2) a written plan is adhered to that requires monitoring of the valve as frequently as practicable during safe-to-monitor times and at least annually and during shutdown. [40 CFR 60.482-7(g)] Federally Enforceable Through Title V Permit

13. For valves subject to applicable NSPS, any valve in gas/vapor service or light liquid service that is designated in the Operator Management Plan as a difficult-to-monitor (inaccessible) valve is exempt from the monthly NSPS leak inspection requirements, provided: 1) the owner/operator demonstrates the valve cannot be monitored without elevating the monitoring personnel more than 15 feet above a support surface, or that it is over 6 feet away from a platform , 2) the process unit within which the valve is located either becomes an affected facility through 40 CFR 60.14 or 60.15 or if the owner/operator designates less than 3.0% of the total number of valves as difficult-to-monitor, and 3) a written plan is adhered to that, requires monitoring of the valve at least annually and during shutdown. [40 CFR 60.482-7(h)] Federally Enforceable Through Title V Permit

14. Any components of the closed vent system that are designated as unsafe to inspect are exempt from the inspection requirements specified in this permit unit if the owner or operator complies with the following: 1) the owner or operator determines that the equipment is unsafe to inspect because inspecting personnel would be exposed to an imminent or potential danger as a consequence of complying with the inspection requirements; 2) the owner or operator identifies the components in the Operator Management Plan; 3) the owner or operator has a written plan that requires inspection of the equipment as frequently as practicable during safe-to-inspect times; and 4) inspection and required repair of the components is performed at least annually and during shutdown. [District Rule 4409, 5.3.7.5 and 40 CFR 60.482-10(j)] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

15. For components subject to applicable NSPS, when a leak is detected, a weatherproof and readily visible tag shall be attached, bearing the equipment identification number and date which the leak is detected. The tag on a valve shall remain in place until after it has been monitored for 2 successive months and no leak has been detected. The tag on all other equipment may be removed after repair and re-inspection document compliance with the applicable NSPS. [40 CFR 60.486(b) and 60.635(b)(1)] Federally Enforceable Through Title V Permit

16. Any leak detected on the basis of sight, smell, or sound shall be identified by the operator affixing a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until repair and reinspection document compliance, whether or not operator inspection is otherwise required by this permit. [District Rule 4409, 5.3.3 and5.3.3] Federally Enforceable Through Title V Permit

17. Any leaking component and any leak shall be repaired to a leak-free condition and reinspected within 15 calendar days. [40 CFR 60.482-7] Federally Enforceable Through Title V Permit

18. For components subject to applicable NSPS standards, except as otherwise provided by 40 CFR 60.482-9, any component leak shall be repaired to a leak-free condition, or vented to a flare satisfying the requirements of 40 CFR 60.18, or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 or EPA Method 18 within fifteen (15) calendar days of detection. A first attempt at repair shall be made no later than 5 calendar days after leak detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates necessary and sufficient actions are being taken to correct the leak within this time period. [40 CFR 60.482-2(c)(1) and (c)(2), 60.482-3(g), 60.482-7(d), 60.482-8(c), and 60.633(b)(3)] Federally Enforceable Through Title V Permit

19. For components subject to applicable NSPS, if the leaking component is an essential part of a critical process identified in the operator management plan and which cannot be immediately shut down for repairs, the operator shall minimize the leak within 15 calendar days. If the leak which has been minimized still exceeds the applicable NSPS standard, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than six months from the date of the original leak detection for pumps and one year from the date of the original leak detection for other components. Delay of repair is allowed for equipment which is isolated from the process and which does not remain in VOC service and delay of repair is is allowed pursuant to 40 CFR 60.482-2(c)(1), 40 CFR 60.482-3(g)(1), 40 CFR 60.482-4(b)(1), 40 CFR 60.482-7(d)(1),40 CFR 60.482-8(c)(1) [40 CFR 60.482- 2(c)(1). [40 CFR 40 CFR 60.482-3(g)(1), 40 CFR 60.482-4(b)(1), 40 CFR 60.482-7(d)(1),40 CFR 60.482-8(c)(1), 60.482-9(a) and (b)] Federally Enforceable Through Title V Permit

20. Delay of repair of a closed vent system for which leaks have been detected is allowed if the closed vent system is an essential part of a critical process identified in the operator management plan which cannot be immediately shut down for repairs or if the owner or operator determines that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair. However the operator shall minimize the leak within 15 calendar days. If the leak which has been minimized still exceeds the limit in this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. [40 CFR 60.482-9] Federally Enforceable Through Title V Permit

21. For the purpose of determining compliance with District Rule 4409, the operator shall maintain an inspection log that has been signed and dated by the facility operator responsible for the inspection, certifying the accuracy of the information recorded in the log. The inspection log shall contain all of the following information: 1) The total number of components inspected, and the total number and percentage of leaking components found by component types; 2) The location, type, name or description of each leaking component and the description of any unit where the leaking component is found; 3) Date of the leak detection and method of the leak detection; 4) For gaseous leaks, record the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak; 5) The date of repair, replacement, or removal from operation of the leaking component(s); 6) The identification and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes first; 7) The method(s) used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier; 8) The date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced; 9) The inspector's name, business mailing address, and business telephone number. [District Rule 4409, 6.2.1] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

22. For the purpose of determining compliance with applicable NSPS, each operator shall maintain an inspection log for the components subject to NSPS inspection requirements that contains the following information: 1) instrument, operator, and equipment identification numbers; 2) date of leak detection; 3) dates and repair method of each attempt to repair the leak; 4) "above 10,000" if the maximum instrument reading after each repair attempt is equal to or greater than 10,000 ppm; 5) "repair delayed", reason for delay, signature of individual whose decision it was that repair could not be effected without a process shutdown, and expected date of successful repair if a leak is not repaired within 15 days of detection; 6) dates of process unit shutdown that occur while the equipment is unrepaired; 7) date of successful repair and emission level of recheck after leak is repaired. [District Rule 40 CFR 60.486(c) and 60.635(2)(i) through (ix)] Federally Enforceable Through Title V Permit

23. Each piece of equipment subject to requirements of this permit is presumed to be in VOC service or in wet gas service unless an owner or operator demonstrates that the piece of equipment is not in VOC service or in wet gas service. For a piece of equipment to be considered not in VOC service, it must be determined that the VOC content can be reasonably expected never to exceed 10.0 percent by weight. For a piece of equipment to be considered in wet gas service, it must be determined that it contains or contacts the field gas before the extraction step in the process. For purposes of determining the percent VOC content of the process fluid that is contained in or contacts a piece of equipment, procedures that conform to the methods described this permit shall be used. [40 CFR 60.485(d) and 60.632(f)] Federally Enforceable Through Title V Permit

24. Compliance the no detectable emission standards for this permit unit shall be determined as follows: 1) EPA Method 21 shall be followed, 2) Method 21 shall be used to determine the background level and all potential leak interfaces shall be traversed as close to the inter face as possible, and 3) the arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 500 ppm to determine compliance. [40 CFR 60.485(c)] Federally Enforceable Through Title V Permit

25. For valves subject to applicable NSPS, if the operator elects to comply with the allowable percentage of leaking valves then for this permit unit, the operator shall notify the APCO 90 days before implementing these alternatives. [40 CFR 60.483-1(b)(1) and (d), 60. 483-2(a)(2), and 60.487(d)] Federally Enforceable Through Title V Permit

26. For valves subject to applicable NSPS, if the allowable percentage of leaking valves is selected, then a performance test shall be conducted initially upon designation for allowable percentage of leaking valves, annually, and at other times requested by the APCO. The performance test shall be conducted as follows: 1) all valves in gas/vapor and light liquid service shall be monitored within 1 week using EPA Method 21 and 2) the leak percentage shall be determined by dividing the number of leaking valves detected and valves for which repair has been delayed by the number of valves in gas/vapor and light liquid service in this permit unit, 3) a record must be kept of the percent of valves found leaking during each leak detection period. [40 CFR 60.483-1(b)(2) and (c) and 60. 483-2(b)(5) and (6)] Federally Enforceable Through Title V Permit

27. For compressors subject to applicable NSPS, each compressor shall meet the applicable control system requirements of 40 CFR 482-3(a) - (i), except as otherwise provided by 40 CFR 60.482-1(c) and 40 CFR 60.482-3(h) and (i). [40 CFR 60.482-3(a) through (j)], 40 CFR 60.482-1(c), 40 CFR 60.482-3(h) and (i), and 40 CFR 60.633] Federally Enforceable Through Title V Permit

28. Compressors that are subject to applicable NSPS, are exempt from requirements of 40 CFR 60.482-3(a) and 40 CFR 60.482-3(b) if the compressor is equipped with a closed vent system to capture and transport leakage from the compressor drive shaft back to a process fuel gas system or a control device. Closed vent systems piping shall comply with applicable requirements at 40 CFR 60.482-10. Closed vent vapor recovery systems shall comply with design requirements at 40 CFR 60.482-10(b). Enclosed combustion devices used by closed vent system shall comply with design requirements at 40 CFR 60.482-10(c). Flares used by closed vent systems shall comply with requirements at 40 CFR 60.482-10(d). Closed vent system control devices shall comply with monitoring requirements at 40 CFR 60.482-10(e). [40 CFR 60 .482-3, 40 CFR 60.482-10] Federally Enforceable Through Title V Permit

29. Compressors that are subject to applicable NSPS and are designated in the Operator Management Plan for no detectable leak emission, as indicated by an instrument reading of less than 500 ppm above background, is are exempt from the requirements of 40 CFR 482-3(a)-(h), provided the compressor is tested for compliance with no detectable emissions initially upon designation, annually, and at other times requested by the APCO. [40 CFR 60.482-3(i)] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

30. When determining compliance with applicable NSPS, if an instrument reading of 10,000 ppm or greater is measured, a leak is detected. [40 CFR 60.633(b)(2), 40482-7(a), (b), and (c] Federally Enforceable Through Title V Permit

31. For open ended lines or valves subject to applicable NSPS, each open-ended valve or line equipped with a second valve shall be operated so that the valve on the process fluid end is closed before the second valve is closed. [40 CFR 60.482-6(b)] Federally Enforceable Through Title V Permit

32. For equipment subject to applicable NSPS when a double block-and-bleed system is being used, the bleed valve or line may remain open only during operations that require venting the line between the block valves. [40 CFR 60.482-6(c)] Federally Enforceable Through Title V Permit

33. Except as provided by applicable NSPS, valves that are subject to NSPS that are in gas/vapor service or light liquid service shall be monitored monthly to detect leaks using EPA Method 21. Any valve for which a leak is not detected for 2 successive months may be monitored the first month of every quarter. If a leak is subsequently detected, monitoring shall revert to monthly. [40 CFR 60.482-7(a), (b), and (c)] Federally Enforceable Through Title V Permit

34. Any valve in gas/vapor service or light liquid service that is designated in the equipment log list for no detectable leak emission, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the monitoring requirements of 40 CFR 60.482-7(a), provided the valve: 1) has no external actuating mechanism in contact with the process fluid and 2) is tested for and meets compliance with no detectable leak emission initially upon designation, annually and at other times requested by the APCO. [40 CFR 60.482-7(f)] Federally Enforceable Through Title V Permit

35. For valves subject to applicable NSPS requirements, for a valve in gas/vapor service or light or heavy liquid service, first attempts at repair shall include the following where practicable: 1) tightening of bonnet bolts, 2) replacement of bonnet bolts, 3) tightening of packing gland nuts, and 4) injection of lubricant into lubricant packing. [40 CFR 60.482-7(e) and 60.482-8(d)] Federally Enforceable Through Title V Permit

36. For pumps and valves in heavy liquid service, pressure relief devices in light or heavy liquid service, and flanges and other connectors, that are subject to applicable NSPS requirements, if evidence of a potential leak is found by sight, sound, smell, or any other detection method then the device shall be monitored within 5 days for leak detection in accordance with EPA Method 21. A leak is detected if an instrument reading of 10,000 ppm or greater is measured. [40 CFR 60.482-8(a) and (b)] Federally Enforceable Through Title V Permit

37. In addition to the information required by Rule 4409, the operator management plan shall include an addendum for this permit unit containing the following applicable NSPS information: 1) list of identification numbers for equipment subject to the applicable NSPS requirements, 2) list of identification numbers for equipment which is designated for no detectable emissions and which is signed by the owner/operator, 3) list of equipment identification numbers for pressure relief devices which must be operated with no detectable emissions, 4) dates of each compliance test for emissions below 500 ppm, for all equipment subject to this no detectable emission limit and the background level measured and the maximum instrument reading measured at the equipment, during each test, and 5) list of identification numbers for equipment in vacuum service. [40 CFR 60.486(e) and 60.635(b)(2)(x)] Federally Enforceable Through Title V Permit

38. In addition to the information required by Rule 4409, the operator management plan shall include an addendum for this permit unit containing the following applicable NSPS information: for valves in gas/vapor service and light liquid service: 1) a list of identification numbers for valves designated "unsafe-to-monitor" and for valves designated "difficult-to monitor", 2) an explanation for each valve stating why it is so designated, and 3) the schedule for monitoring each such valve. [40 CFR 60.486(f)] Federally Enforceable Through Title V Permit

39. For valves subject to NSPS annual leak detection alternative requirements, the NSPS inspection log shall include the following information: 1) a schedule of monitoring and 2) the percent of valves found leaking during each monitoring period. [CFR 60.486(g)] Federally Enforceable Through Title V Permit

40. A log containing the following information for pumps and compressors equipped a barrier fluid seal system which includes a seal failure sensor, for which a system failure criteria is required to be established, pursuant to the requirements for this permit unit, shall be maintained and kept in a readily accessible location: 1) the design criterion required by this permit and an explanation and 2) any changes to this criterion and reasons for the changes. [40 CFR 60.486(h)] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

41. For equipment (compressors and components) subject to applicable NSPS, the operator shall maintain information and data used to demonstrate that a piece of equipment is not in VOC service and information and data used to demonstrate that a reciprocating compressor is in wet gas service. The information shall be included in the NSPS inspection log for the permit unit and shall be kept in a readily accessible location. [40 CFR 60.486(j) and 60.635(c)] Federally Enforceable Through Title V Permit

42. Vapor recovery systems (for example, condensers and absorbers) shall be designed and operated to recover the VOC emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 parts per million by volume, whichever is less stringent. [40 CFR 60.482-10(b)] Federally Enforceable Through Title V Permit

43. Enclosed combustion devices shall be designed and operated to reduce the VOC emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 parts per million by volume, on a dry basis, corrected to 3 percent oxygen, whichever is less stringent or to provide a minimum residence time of 0.75 seconds at a minimum temperature of 816 °C. [40 CFR 60.482-10(c)] Federally Enforceable Through Title V Permit

44. If the vapor collection system or closed vent system is constructed of hard-piping, the owner or operator shall conduct an initial inspection according to the procedures specified in EPA Method 21 using the calibration gases as specified in the requirements for this permit unit. The owner or operator shall also conduct annual visual inspections for visible, audible, or olfactory indications of leaks. [40 CFR 60.482-10(f)(1) and 40 CFR 60.485(b)] Federally Enforceable Through Title V Permit

45. If the vapor collection system or closed vent system is constructed of ductwork, the owner or operator shall conduct an initial inspection and annual inspections according to the procedures specified in EPA Method 21 using the calibration gases as specified in the requirements for this permit unit. The owner or operator shall also conduct annual visual inspections for visible, audible, or olfactory indications of leaks. [40 CFR 60.482-10(f)(2) and 40 CFR 60.485(b)] Federally Enforceable Through Title V Permit

46. Any parts of the closed vent system that are designated as difficult to inspect are exempt from the inspection requirements of 40 CFR 60.482-10(f)(1) and (f)(2) if the owner or operator complies with the following: 1) the owner or operator determines that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters above a support surface; and 2) the process unit within which the closed vent system is located becomes an affected facility through modification or reconstruction, as defined in 40 CFR 60.14 and 60.15, or the owner or operator designates less than 3.0 percent of the total number of closed vent system equipment as difficult to inspect; and 3) the owner or operator has a written plan that requires inspection of the equipment at least every 5 years. A closed vent system is exempt from inspection if it is operated under a vacuum. [40 CFR 60.482-10(k)] Federally Enforceable Through Title V Permit

47. Closed vent systems and control devices shall be operated at all times when emissions may be vented to them. [40 CFR 60.482-10(m)] Federally Enforceable Through Title V Permit

48. A log shall be maintained containing the following information: 1) identification of all parts of the closed vent system that are designated as unsafe to inspect, an explanation of why the equipment is unsafe to inspect, and the plan for inspecting the equipment; 2) identification of all parts of the closed vent system that are designated as difficult to inspect, an explanation of why the equipment is difficult to inspect, and the plan for inspecting the equipment; 3) for each inspection conducted in accordance with EPA Method 21 during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected; and 4) for each visual inspection conducted for visible, audible, or olfactory indications of leaks during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected. [40 CFR 60.482-10(l) and 40 CFR 60.485(b)] Federally Enforceable Through Title V Permit

49. For components subject to applicable NSPS requirements, semiannual reports shall be submitted to the APCO containing the following information: 1) process unit identification, 2) for each month during the reporting period, number of valves, pumps, compressors, and pressure relief devices for which leaks were detected; number of valves, pumps, compressors, and pressure relief devices for which leaks were not repaired within 15 days and a first attempt not made within 5 days of leak detection; the facts that explain each delay of repair and, where appropriate, why a process unit shutdown was technically infeasible 3) dates of process unit shutdowns which occurred within the reporting period, and 4) revisions to items reported in the initial or subsequent semiannual reports. [40 CFR 60.487(a) and (c) and 60.636(c)] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

50. All logs required for this permit unit and all records of required monitoring data and support information shall be retained by the operator for a minimum of five years after the date of an entry, kept in a readily accessible location, and made available upon request to District personnel. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

51. Authority to Construct (ATC) S-2234-176-0 shall be implemented prior to the implementation of this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-180-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 29 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-19) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

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DAVID WARNER, Director of Permit Services

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-181-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 29 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-20) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

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DAVID WARNER, Director of Permit Services
S-2234-181-1 : Feb 18 2010 1:29PM -- ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-196-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 35 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-125) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE (S-2234): DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] Federally Enforceable Through Title V Permit
6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] 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

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DAVID WARNER, Director of Permit Services
S-2234-196-1 : Feb 18 2010 1:29PM – ROEDERS : Joint Inspection NOT Required

7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-196-0 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-197-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 35 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-126) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE (S-2234): DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] Federally Enforceable Through Title V Permit
6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-197-1 : Feb 18 2010 1:29PM -- ROEDERS : Joint Inspection NOT Required

7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-197-0 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-200-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 35 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (R-22) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-200-0 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-201-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 35 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-107) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-201-1 : Feb 18 2010 1:29PM – ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-201-0 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-202-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 35 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-55) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
S-2234-202-1 : Feb 18 2010 1:30PM -- ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-202-0 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-2234-203-1 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS, INC.
MAILING ADDRESS: 10800 STOCKDALE HWY
BAKERSFIELD, CA 93311

LOCATION: GAS PLANT
SECTION SE-35, T-30S, R-23E
TUPMAN, CA

SECTION: 35 **TOWNSHIP:** 30S **RANGE:** 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF ELECTRIC MOTOR DRIVEN COMPRESSOR SKID (K-56) AUTHORIZED FOR OPERATION AT VARIOUS UNSPECIFIED LOCATIONS WITHIN THE GAS PROCESSING STATIONARY SOURCE: DELETE FUGITIVE VOC CONTENT LIMIT, RECALCULATE AND RESTATE THE FUGITIVE VOC EMISSIONS BASED ON 100% VOC, AND DELETE REQUIREMENT TO TEST GAS FOR VOC CONTENT

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operator shall notify the District by letter or fax at least 48-hours in advance of the re-location of this unit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of compressor skid location and dates spent at each location and make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. This unit shall not operate within 1,000 feet of a kindergarten through 12 grade school. [CH&SC 42301.6] 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

DRAFT

DAVID WARNER, Director of Permit Services
8-2234-203-1: Feb 18 2010 1:30PM – ROEDERS : Joint Inspection NOT Required

6. Compressor skid shall only be used in conjunction with gas processing operations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive emissions, calculated using CAPCOA California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c (Feb 1999), with no leaks greater than or equal to 10,000 ppm, shall not exceed 0.7 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. This unit shall comply with all of the requirements of District Rule 4409, as specified on facility wide permit S-2234-0. [District Rule 4409] Federally Enforceable Through Title V Permit
9. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. Authority to Construct (ATC) S-2234-203-0 shall be implemented prior to the implementation of this ATC. [District Rule 2201]

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