Our Vision Clean Air

Santa Barbara County
Air Pollution Control District

NOV 10 2011

Mr. Gerardo Rios
USEPA – Permits Office (AIR 3)
75 Hawthorne Street
San Francisco, CA 94105

FID: 00028, 01065, 03035, 03105
Permits: 7904-R9, 4441-R5, 8103-R8, 8234-R8
SSID: 01063

Re: Proposed Part 70/APCD PTOs 4441-R5, 7904-R9, 8103-R8, and 8234-R8

Dear Mr. Rios:

This letter transmits Proposed Part70/APCD Permits to Operate (PTOs) 4441-R5, 7904-R9, 8103-R8, and 8234-R8 for the Venoco-Ellwood Stationary Source. Included with the proposed permits is a copy of the application submitted by the applicant for this modification. We plan to issue these permits as final after December 27, 2011 provided your office has not objected to such issuance during this time interval.

If you have any questions, please contact Brian Kato of my staff at (805) 961-8898.

Sincerely,

Michael Goldman, Manager
Engineering & Compliance Division

enc: Proposed PTOs
Application forms

PT-70/Reeval 8234-R8
FID # 3105

VENOCO, INC.

May 13, 2011

Mr. Brian Kato
Santa Barbara County APCD
260 N. San Antonio Road, Suite A
Santa Barbara, CA 93110-1315

Subject: Ellwood Stationary Source Part 70 Renewal Forms (SSID 01063)

Dear Brian:

Enclosed are the required Title V forms for Venoco's Ellwood Source facilities to initiate the reevaluation process for the subject permits within the stationary source. The facilities included in the Ellwood Source are the Ellwood Onshore Facility, Platform Holly, Ellwood Beachfront Lease and the Seep Containment Device.

Per our phone conversation today, I have listed Platform Holly draft permits 8234-05 and 13475 in this submittal. While these permits have not yet been issued final, they have been included because it is anticipated by you that final issuance for each will occur prior to the June 11, 2011 application deadline date.

While it is likely that various components of the permits will be discussed during the reevaluation process, Venoco is requesting a modification to a specific permit condition with this submittal: *removal of the term "CARB-certified" from condition 3.f of PTO 12804.* The current condition specifies that any visible emissions (5% opacity or greater) triggers source testing, and the requirement for a CARB-certified observer is not necessary in order to conduct a simple "smoke/no smoke" determination.

Please contact me at (805) 745-2170, or by e-mail at john.garnett@venocoinc.com, if you have any questions regarding this submittal. I look forward to working with you during the reevaluation process.

Sincerely,

John Garnett
Environmental Coordinator

cc: Ben Ellenberger

STATIONARY SOURCE SUMMARY
(Form 1302-A1)

APCD: Santa Barbara County Air Pollution Control District
COMPANY NAME: Venoco Inc.

➢ APCD USE ONLY ≺

APCD IDS Processing ID:

Application #:

Date Application Received:

Application Filing Fee*:

Date Application Deemed Complete:

I. SOURCE IDENTIFICATION

1. Source Name: Venoco – Ellwood Stationary Source
2. Four digit SIC Code: 1311 USEPA AIRS Plant ID (for APCD use only):
3. Parent Company (if different than Source Name):
4. Mailing Address of Responsible Official: 6267 Carpinteria Ave., Suite 200; Carpinteria, CA 93013
5. Street Address of Source Location (include Zip Code): Ellwood Onshore Facility, 7979 Hollister Ave., Goleta, CA 93117
6. UTM Coordinates (if required) (see instructions):
7. Source located within: 50 miles of the state line [ ] Yes [X] No
   50 miles of a Native American Nation [ ] Yes [ ] No [X] Not Applicable
8. Type of Organization: [X] Corporation [ ] Sole Ownership [ ] Government
   [ ] Partnership [ ] Utility Company
9. Legal Owner's Name: Venoco Inc.
10. Owner's Agent Name (if any): Title: Telephone #:
11. Responsible Official: Ed O'Donnell Title: Senior V.P. Coastal Assets Telephone #:805-745-2100
12. Plant Site Manager/Contact: Jeff MacDonald Title: Sr. Operations Supervisor Telephone #:805-961-2301
13. Type of facility: Oil and Gas Production
14. General description of processes/products: Crude Oil and Natural Gas
15. Does your facility store, or otherwise handle, greater than threshold quantities of any substance on the Section 112(r) List of Substances and their Thresholds (see Attachment A)? [ ] Yes [X] No
16. Is a Federal Risk Management Plan [pursuant to Section 112(r)] required? [X] Not Applicable [ ] Yes [ ] No
    (If yes, attach verification that Risk Management Plan is registered with appropriate agency or description of status of Risk Management Plan submittal.)

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

STATIONARY SOURCE SUMMARY
(Form 1302-A2)

APCD: Santa Barbara County Air Pollution Control District	➢ APCD USE ONLY ≺ APCD IDS Processing ID:
COMPANY NAME: Venoco Inc.	SOURCE NAME: Ellwood Onshore Facility

II. TYPE OF PERMIT ACTION

	CURRENT PERMIT (permit number)	EXPIRATION (date)
☐ Initial SBCAPCD's Regulation XIII Application		
XX Permit Renewal	7904-R8, 13420, 8234-R7, 12804, 8234-05, 13475, 8103-R7, 4441-R4	December 2011
☐ Significant Permit Revision*		
Minor Permit Revision*		
☐ Administrative Amendment		

III. DESCRIPTION OF PERMIT ACTION

1. Does the permit action requested involve: a: [ ] Portable Source [ ] Voluntary Emissions Caps
   [ ] Acid Rain Source [ ] Alternative Operating Scenarios
   [ ] Source Subject to MACT Requirements [Section 112]

   b: [X] None of the options in 1.a. are applicable

2. Is source operating under a Title V Program Compliance Schedule? [ ] Yes [X] No

3. For permit modifications, provide a general description of the proposed permit modification:

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

TOTAL STATIONARY SOURCE EMISSIONS
(Form 1302-B)

APCD: **Santa Barbara County Air Pollution Control District**	**➢ APCD USE ONLY ≺** **APCD IDS Processing ID:**
COMPANY NAME: Venoco Inc.	**SOURCE NAME: Ellwood Onshore Facility**

I. TOTAL STATIONARY SOURCE EMISSIONS

Provide a brief description of operating scenario: The Ellwood Onshore Facility consists of the following primary emission systems and processes: Crude oil receiving system; Crude oil processing system; Crude oil and other HC liquid storage & transfer system; Gas receiving system; Gas processing/delivery system, sulfur removal, including dehydration, sweetening and CO_2 removal; Gas compression/Low temperature system, including LPG/NGL recovery; Loading rack for LPG and NGL and other HC liquid trucks; Vapor/Flare gas collection and incineration system; Produced and waste water system; Pipeline and Equipment components with fugitive emissions; and, Support system including process heater.

POLLUTANT* (name)	EMISSIONS (tons per year)	PRE-MODIFICATION EMISSIONS (tons per year)	EMISSIONS CHANGE (tons per year)
NOx	**204.39**		
ROC	**23.77**		
CO	**96.31**		
PM	**15.36**		
PM-10	**14.86**		
SOx	**27.23**		
	Note: combined Federal PTE		

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

CERTIFICATION STATEMENT
(Form 1302-M)

APCD:	➢ APCD USE ONLY ≺
Santa Barbara County Air Pollution Control District	APCD IDS PROCESSING ID:
COMPANY NAME: Venoco Inc.	SOURCE NAME: Ellwood Onshore Facility

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

Forms included with application

_x_ Stationary Source Summary Form
_x_ Total Stationary Source Emission Form
___ Compliance Plan Form
___ Compliance Plan Certification Form
___ Exempt Equipment Form
_X__ Certification Statement Form

List other forms or attachments

_____
_____
_____

[ ] check here if additional forms listed on back

Attachments included with application

___ Description of Operating Scenarios
___ Sample emission calculations
___ Fugitive emission estimates
___ List of Applicable requirements
___ Discussion of units out of compliance with applicable federal requirements and, if required, submit a schedule of Compliance
___ Facility schematic showing emission points
___ NSR Permit
___ PSD Permit
___ Compliance Assurance monitoring protocols
___ Risk management verification per 112(r)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, that the information contained in this application, composed of the forms and attachments identified above, are true, accurate, and complete.

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

Ed O'Donnell 5/13/2011

Signature of Responsible Official **Date: May 13, 2011**

Print Name of Responsible Official: Ed O'Donnell

Title of Responsible Official and Company Name: _ Senior Vice President, Coastal Assets, Venoco Inc. ____

CERTIFICATION STATEMENT
(Form 1302-M continued)

APCD: **Santa Barbara County Air Pollution Control District**	**➢ APCD USE ONLY ≺** **APCD IDS PROCESSING ID:**
COMPANY NAME: Venoco Inc.	**SOURCE NAME: Ellwood Onshore Facility**

List Other Forms or Attachments (cont.)

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___Ellwood Stationary Source Deminimis _____

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SBAPCD RULE 202 - De Minimus Tracking Log

Facility: Ellwood Onshore Facility

Facility Type: Gas Processing Plant

Project Date:	Originator:	Project:	Controlled ROC Emission (lbs/Day):
			0.00
1/1/1998	I & M Inspector	Miscellaneous additions in 1st quarter - 1998	0.12
1/1/1998	Mobil	H-204 Modifications	0.12
4/1/1998	I & M Inspector	Miscellaneous additions in 2nd quarter - 1998	0.32
7/1/1998	I & M Inspector	Miscellaneous additions in 3rd quarter - 1998	0.20
7/1/1998	I & M Inspector	H-205 Modifications to burner	0.00
10/1/1998	I & M Inspector	Miscellaneous additions in 4th quarter - 1998	0.22
1/1/1999	I & M Inspector	Miscellaneous additions in 1st quarter - 1999	0.20
4/1/1999	I & M Inspector	Miscellaneous additions in 2nd quarter - 1999	0.17
5/19/1999	Bob Van Nostrand	Provide fuel gas to 4" utility line for Holly flare	0.13
7/1/1999	I & M Inspector	Miscellaneous additions in 3rd quarter - 1999	0.14
9/10/1999	Tony Martinez	MOC: EOSF-99-0010 - Install chem. Inj. Quill, H	0.09
10/1/1999	I & M Inspector	Miscellaneous additions in 4th quarter - 1999	0.59
10/23/1999	Dennis Harper	MOC: EOSF-99-0013 - Install PI's on oil & gas pi	0.25
1/1/2000	I & M Inspector	Miscellaneous additions in 1st quarter - 2000	0.93
4/1/2000	I & M Inspector	Miscellaneous additions in 2nd quarter - 2000	0.47
5/25/2000	Bob Van Nostrand	MOC: EOSF-00-0015 - Installation of shut-in val	0.09
6/8/2000	Tony Martinez	EOSF-00-0016 - Installation of corrosion coupons	0.11
7/1/2000	I & M Inspector	Miscellaneous additions in 3rd quarter - 2000	0.11
8/25/2000	Tony Martinez	EOSF-00-0019 - K-205 chemical injection points	0.01
10/1/2000	I & M Inspector	Miscellaneous additions in 4th quarter - 2000	0.01
11/10/2000	Tony Martinez	EOSF-00-0023 - K-205 2nd stg. Disch. Corrosion	0.10
2/19/2001	Bob Van Nostrand	EOSF-01-0028 - Install 8" isolation vlv. Inlet S-20	0.09
2/19/2001	George Economus	EOSF-01-0030 - New pump & mech. Seal for S-2	0.19
5/24/2001	Bob Van Nostrand	MOC: EOSF-01-0039 - S-205 de-commission	0.10
5/31/2001	Bob Van Nostrand	EOSF-01-0056 - Level switch spacer, V-235	0.09
5/31/2001	Bob Van Nostrand	EOSF-01-0041 - Isolation valves for PVSV's on tk	0.19
6/14/2001	Bob Van Nostrand	EOSF-01-0044 - PSV-230/235/240 isolation valve	0.28
11/14/2001	Bob Van Nostrand	MOC: EOSF-01-0057 - Replace V-220A/C	0.26
4/16/2002	Bob Van Nostrand	MOC: EOSF-02-0065 - Removal of V-220 from s	0.09

cc: Laura Kranzler - Venoco, Inc.

SBAPCD RULE 202 - De Minimus Tracking Log

Facility: Ellwood Onshore Facility

Facility Type: Gas Processing Plant

Project Date:	Originator:	Project:	Controlled ROC Emission (lbs/Day):
12/2/2002	Bob Van Nostrand	MOC: EOSF-02-81, Relocate V-119 LCV	0.17
12/2/2002	Bob Van Nostrand	MOC: EOSF-02-82, Install PSV on V-234	0.27
12/2/2002	Bob Van Nostrand	MOC: EOSF-02-85, Install PSV on E-225	0.26
12/2/2002	Bob Van Nostrand	MOC: EOSF-02-79, Install PSV so. end E-207	0.26
12/2/2002	Bob Van Nostrand	MOC: EOSF-02-83, Install PSV on NGL load line	0.26
1/1/2003	Bob Van Nostrand	MOC: EOSF-02-88, Ck. vlv. In gas line to pig rec'	0.01
1/30/2003	Jeff MacDonald	MOC: EOSF-03-92, 2" ck vlv on emulsion inlet	0.03
1/31/2003	Jeff MacDonald	MOC: EOSF-03-89, installation of GC analyzer	0.20
8/22/2007	Walt McCarty	MOC: EOSF-07-122; bottom of F-2201 to Stainle	0.03
11/28/2007	Walt McCarty	EOSF-07-123 - Oil header,E-102 to HT-201,201	0.18
5/1/2008	Joel Toreja	**remove*** MOC: EOSF-08-125 - VRU Mitiga	0.00
9/2/2009	Chris Fox	EOSF-09-128 - Installation of new P-203	0.69
9/2/2009	Chris Fox	EOSF-09-127 - Vlv. Install on T-202/203 for P-20	0.46
12/8/2009	Bob Van Nostrand	MOC: EOSF-09-131, Hot tap H-206 flare line	0.09
6/14/2010	Bob Van Nostrand	MOC: EOSF-10-0134 - Hot tap of oil pipeline	0.03
3/28/2011	Bob Van Nostrand	**remove** stabilizer overhead temporary line	0.00
3/28/2011	Bob Van Nostrand	H-205 burner replacement	2.08
5/10/2011	Bob Van Nostrand	Stabilizer Overhead Line	0.29
Aggregate Total Controlled ROC Emissions (lbs/day) as of 5/12/2011:			**10.98**

cc: Laura Kranzler - Venoco, Inc.

SBAPCD RULE 202 - De Minimus Tracking Log

Facility: Platform Holly

Facility Type: Offshore Platform

Project Date:	Originator:	Project:	Controlled ROC Emission (lbs/Day):
			0.00
7/1/1998	I & M Inspector	Miscellaneous additions in 3rd quarter - 1998	0.05
10/1/1998	I & M Inspector	Miscellaneous additions in 4th quarter - 1998	0.05
1/1/1999	I & M Inspector	Miscellaneous additions in 1st quarter - 1999	0.05
4/1/1999	I & M Inspector	Miscellaneous additions in 2nd quarter - 1999	0.19
5/19/1999	Bob Van Nostrand	HOLL-99-0020, HOLL-00-0045 - Flare installation	0.56
5/20/1999	Bob Van Nostrand	HOLL-99-0024 - Add PSLL on REDA pump disch	0.00
5/20/1999	Bob Van Nostrand	HOLL-99-0025 - Add PSLL on inlet to V-121	0.02
7/1/1999	I & M Inspector	Miscellaneous additions in 3rd quarter - 1999	0.35
10/1/1999	I & M Inspector	Miscellaneous additions in 4th quarter - 1999	0.35
12/28/1999	Bob Van Nostrand	HOLL-99-0037 - Add PSH-155/156 to annulus lin	0.09
12/28/1999	Bob Van Nostrand	HOLL-99-0038 - Add PSL-154, PSL-158, PSLL-13	0.10
1/1/2000	I & M Inspector	Miscellaneous additions in 1st quarter - 2000	0.13
4/1/2000	I & M Inspector	Miscellaneous additions in 2nd quarter - 2000	0.10
5/15/2000	Bob Van Nostrand	HOLL-00-0043 - New pilots on wells	1.59
7/1/2000	I & M Inspector	Miscellaneous additions in 3rd quarter - 2000	0.04
10/1/2000	I & M Inspector	Miscellaneous additions in 4th quarter - 2000	0.08
8/4/2001	Greg Marsh	MOC: HOLL-01-0063 - Reconfigure well tree val	0.03
8/8/2001	Walt McCarty	MOC: HOLL-01-0056 - Rig generator engine fuel	0.47
10/4/2001	Bob Van Nostrand	MOC: HOLL-01-0066 - Install isola. Vlvs. For tes	0.59
1/23/2002	Jeff MacDonald	MOC: HOLL-02-0067 - Fuel gas for gen set's #1,	0.17
8/27/2002	Bob Van Nostrand	MOC: HOLL-02-0068 - Install PSV-117A/B	0.62
9/11/2002	Sally English	HOLL-02-072, Installation of new chemical skid	1.62
10/28/2002	Rob Campbell-Tayl	MOC: HOLL-02-74, Holly wellbay modifications	0.01
2/11/2003	Sally English	HOLL-03-076, 4" crossover between 3120 & 324	0.01
4/9/2003	Sally English	HOLL-03-077, 2" flowlines to 3242-7	0.01
12/8/2003	Jeff MacDonald	MOC: HOLL-03-79, New chemical pump	1.03
12/8/2003	Jeff MacDonald	MOC: HOLL-03-80, REDA pump bypass,strainer	0.01
8/12/2004	Bob Van Nostrand	Holl-04-082; ESP & associated piping installation	0.19

cc: Laura Kranzler - Venoco, Inc.

SBAPCD RULE 202 - De Minimus Tracking Log

Facility: Platform Holly

Facility Type: Offshore Platform

Project Date:	Originator:	Project:	Controlled ROC Emission (lbs/Day):
9/15/2006	Walt McCarty	Well 3120-15 Modification's	0.09
9/15/2006	Walt McCarty	Well 3120-13 Modification's	0.00
9/15/2006	Walt McCarty	Well 3120-16 Modification's	0.74
9/15/2006	Walt McCarty	Well 3242-18 Modification's	0.29
9/15/2006	Walt McCarty	Well 3120-12 Modification's	0.33
9/15/2006	Walt McCarty	Well 3242-19 Modification's	0.00
9/19/2006	Walt McCarty	Well 3242-9 Modification's	0.31
6/28/2007	Chris Fox	HOLL-07-099, Addition of PSV-183 on 3120-11	0.13
11/26/2007	Teddy Sagun	HOLL-07-103, V-106,109 tie in's,isolation pt./line	0.10
12/22/2008	Walt McCarty	HOLL-07-0098; Installation of heater treater	2.01
1/28/2009	Joel Toreja	HOLL-08-0110, Fuel gas filter installation	0.84
8/27/2009	Walt McCarty	HOLL-09-0115 - V-106 make-up gas line	0.47
9/24/2009	Bob Manning	HOLL-09-116 - Install V-106 vent line	0.24
7/8/2010	Bob Van Nostrand	MOC: HOLL-10-117, Low Pressure Flare drip leg	0.44
Aggregate Total Controlled ROC Emissions (lbs/day) as of 5/12/2011:			**14.50**

cc: Laura Kranzler - Venoco, Inc.

SBAPCD RULE 202 - De Minimus Tracking Log

Facility: Beachfront Lease 421

Facility Type: Production Field

Project Date:	Originator:	Project:	Controlled ROC Emission (lbs/Day):
			0.00
Aggregate Total Controlled ROC Emissions (lbs/day) as of 5/12/2011:			**0.00**

cc: Laura Kranzler - Venoco, Inc.