ExxonMobil Production
P.O. Box 4358
Houston, TX 77210-4358

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Production

March 11, 2010

Santa Ynez Unit
POPCO Gas Plant, Carbon Canister
Application

Mr. Ben Ellenberger
Santa Barbara County
Air Pollution Control District
260 North San Antonio Road, Suite A
Santa Barbara, CA 93110

Dear Mr. Ellenberger:

On behalf of Pacific Offshore Pipeline Company (POPCO), ExxonMobil hereby submits a PTO permit application package for the dual carbon canister system installed on tank T-601 at the POPCO Gas Plant to comply with the control requirements of Rule 325.D as requested. This system was installed as authorized under ATC 13163, and in accordance with the requirements of Condition 7 (Source Compliance Demonstration Period), PTO and Title V applications are required.

You are hereby authorized to deduct the subject permit fees from ExxonMobil's reimbursable account.

If you have any questions or comments please contact Katie Wilson at (281) 654-0742.

Sincerely,

Frank C. Betts
SYU Operations Supervisor

Enclosure

cc: Brian Shafritz – SBCAPCD

bcc:
Sandra Combe, ExxonMobil (Port Hueneme)
Katie Wilson, ExxonMobil (Houston)
Bart Leininger, ALG (Camarillo)

Print Form

Santa Barbara County
Air Pollution Control District

General Permit Application Form -01

Santa Barbara County Air Pollution Control District
PO Box 6447, Santa Barbara, CA 93160-6447

1. APPLICATION TYPE (check all that apply):

- ☐ Authority to Construct (ATC)
- ☒ Permit to Operate (PTO)
- ☐ ATC Modification
- ☐ PTO Modification
- ☐ Other (Specify)
- ☐ Transfer of Owner/Operator (use Form -01T)
- ☐ Emission Reduction Credits
- ☐ Increase in Production Rate or Throughput
- ☐ Decrease in Production Rate or Throughput

Previous ATC/PTO Number (if known)

◉ Yes ○ No Are Title 5 Minor Modification Forms Attached? (this applies to Title 5 sources only and applies to all application types except ATCs and Emission Reduction Credits). Complete Title 5 Form -1302 A1/A2, B, and M. Complete Title 5 Form -1302 C1/C2, D1/D2, E1/E2, F1/F2, G1/G2 as appropriate. http://www.sbcapcd.org/eng/dl/appforms/t5-forms (ver1.2).pdf

Mail the completed application to the APCD's Engineering & Compliance Division (ECD) at the address listed above.

2. FILING FEE:
A $325 application filing fee must be included with each application. The application filing fee is COLA-adjusted every July 1st. Please ensure you are remitting the correct current fee (the current fee schedule is available on the APCD's webpage at: http://www.sbcapcd.org/fees.htm). This filing fee will not be refunded or applied to any subsequent application. Payment may also be made by credit card by using the Credit Card Authorization Form at the end of this application.

3. IS YOUR PROJECT'S PROPERTY BOUNDARY LOCATED OR PROPOSED TO BE LOCATED WITHIN 1,000 FEET FROM THE OUTER BOUNDARY OF A SCHOOL? If yes, and the project results in an emissions increase, submit a completed Form -03 (*School Summary Form*) http://www.sbcapcd.org/eng/dl/appforms/apcd-03.pdf ○ Yes ◉ No

If yes, provide the name of school(s)

Address of school(s)

City Zip Code

4. DOES YOUR APPLICATION CONTAIN CONFIDENTIAL INFORMATION? If yes, please submit this information according APCD Policy & Procedure 6100-020 (*Handling of Confidential Information*). http://www.sbcapcd.org/eng/dl/eng_p-and-p/6100-020.pdf. Applications not following this P&P will be returned. ○ Yes ◉ No

FOR APCD USE ONLY				DATE STAMP
FID		Permit No.	PTO 13163	RECEIVED MAR 15 2010 SBCAPCD
Project Name				
Filing Fee	335.00 Billed		202.E? YES / NO	

5. COMPANY/CONTACT INFORMATION:

Owner Info	◉ Yes ○ No	Use as Billing Contact?	
Company Name	ExxonMobil Production Company		
Doing Business As			
Contact Name	Kevin Bailey	Position/Title	Regulatory Compliance Supervisor
Mailing Address	P.O. Box 4358		
City	Houston	State	TX	Zip Code	77210-4358
Telephone	281-654-1130	Fax		Email	

Operator Info	◉ Yes ○ No	Use as Billing Contact?	
Company Name	Same as Owner Information		
Doing Business As			
Contact Name		Position/Title	
Mailing Address			
City		State		Zip Code	
Telephone		Fax		Email	

*Authorized Agent Info**	○ Yes ○ No	Use as Billing Contact?	
Company Name			
Doing Business As			
Contact Name		Position/Title	
Mailing Address			
City		State		Zip Code	
Telephone		Fax		Email	

*Use this section if the application is not submitted by the owner/operator. Complete APCD Form -01A (http://www.sbcapcd.org/eng/dl/appforms/apcd-01a.pdf). Owner/Operator information above is still required.

SEND PERMITTING CORRESPONDENCE TO *(check all that apply)*:

- ☒ Owner
- ☒ Operator
- ☐ Authorized Agent
- ☐ Other (attach mailing information)

6. GENERAL NATURE OF BUSINESS OR AGENCY:

Oil and gas exploration and production

7. EQUIPMENT LOCATION (Address):

Specify the street address of the proposed or actual equipment location. If the location does not have a designated address, please specify the location by cross streets, or lease name, UTM coordinates, or township, range, and section.

Equipment Address: 12000 Calle Real

City: Goleta State: CA Zip Code: 93117

Work Site Phone: 8059614030

○ Incorporated (within city limits) ◉ Unincorporated (outside city limits) ○ Used at Various Locations

Assessors Parcel No(s):

8. PROJECT DESCRIPTION:

(Describe the equipment to be constructed, modified and/or operated or the desired change in the existing permit. Attach a separate page if needed):

Permit the ongoing operation of the additional carbon canister installed per ATC 13163 to abate emissions from waste water tank T-601.

9. DO YOU REQUIRE A LAND USE PERMIT OR OTHER LEAD AGENCY PERMIT FOR THE PROJECT DESCRIBED IN THIS APPLICATION?: ○ Yes ◉ No

A. If yes, please provide the following information

Agency Name	Permit #	Phone #	Permit Date

* The lead agency is the public agency that has the principal discretionary authority to approve a project. The lead agency is responsible for determining whether the project will have a significant effect on the environment and determines what environmental review and environmental document will be necessary. The lead agency will normally be a city or county planning agency or similar, rather than the Air Pollution Control District.

B. If yes, has the lead agency permit application been deemed complete and is a copy of their completeness letter attached?

○ Yes ○ No

Please note that the APCD will not deem your application complete until the lead agency application is deemed complete.

C. If the lead agency permit application has not been deemed complete, please explain.

D. A copy of the final lead agency permit or other discretionary approval by the lead agency may be requested by the APCD as part of our completeness review process.

10. PROJECT STATUS:

A. Date of Equipment Installation: December 2009

B. Have you been issued a Notice to Comply (NTC) or Notice of Violation (NOV) for not obtaining a permit for this equipment/modification *and/or* have you installed this equipment without the required APCD permit(s)? If yes, the application filing is double per Rule 210. ○ Yes ● No

C. Is this application being submitted due to the loss of a Rule 202 exemption? ○ Yes ● No

D. Will this project be constructed in multiple phases? If yes, attach a separate description of the nature and extent of each project phase, including the associated timing, equipment and emissions. ○ Yes ● No

E. Is this application also for a change of owner/operator? If yes, please also include a completed APCD Form -01T. ○ Yes ● No

11. APPLICANT/PREPARER STATEMENT:

The person who prepares the application also must sign the permit application. The preparer may be an employee of the owner/operator or an authorized agent (contractor/consultant) working on behalf of the owner/operator (an *Authorized Agent Form -01A* is required).

I certify pursuant to H&SC Section 42303.5 that all information contained herein and information submitted with this application is true and correct.

Katherine E "Katie" Wilson	3/8/2010
Signature of application preparer	Date
Katie Wilson	ExxonMobil Production Company
Print name of application preparer	Employer name

12. APPLICATION CHECKLIST (*check all that apply*)

☒ Application Filing Fee (Fee = $325. The application filing fee is COLA adjusted every July 1st. Please ensure you are remitting the current fee.) As a convenience to applicants, the APCD will accept credit card payments. If you wish to use this payment option, please complete the attached *Credit Card Authorization Form* and submit it with your application.

☐ Existing permitted sources may request that the filing fee be deducted from their current reimbursable deposits by checking this box. Please deduct the filing fee from my existing reimbursement account.

☐ Form -01T (*Transfer of Owner/Operator*) attached if this application also addresses a change in owner and/or operator status from what is listed on the current permit. http://www.sbcapcd.org/eng/dl/appforms/apcd-01t.pdf

☐ Form -03 (*School Summary Form*) attached if the project's property boundary is within 1,000 feet of the outer boundary of a school (k-12) and the project results in an emissions increase. http://www.sbcapcd.org/eng/dl/appforms/apcd-03.pdf

☒ Information required by the APCD for processing the application as identified in APCD Rule 204 (*Applications*), the APCD's *General APCD Information Requirements List* (http://www.sbcapcd.org/eng/dl/other/gen-info.pdf), and any of the APCD's Process/Equipment Summary Forms (http://www.sbcapcd.org/eng/dl/dl01.htm) that apply to the project.

☐ Form -01A (*Authorized Agent Form*) attached if this application was prepared by and/or if correspondence is requested to be sent to an Authorized Agent (e.g., contractor or consultant). This form must accompany each application. http://www.sbcapcd.org/eng/dl/appforms/apcd-01a.pdf

☐ Confidential Information submitted according to APCD Policy & Procedure 6100-020.

13. NOTICE OF CERTIFICATION:

All applicants must complete the following Notice of Certification. This certification must be signed by the Authorized Company Representative representing the owner/operator. Signatures by Authorized Agents will not be accepted.

NOTICE of CERTIFICATION

I, Frank C. Betts, am employed by or represent

Type or Print Name of Authorized Company Representative

ExxonMobil Production Company (A Subsidiary of ExxonMobil Oil Corporation)

Type or Print Name of Business, Corporation, Company, Individual, or Agency

(hereinafter referred to as the applicant), and certify pursuant to H&SC Section 42303.5 that all information contained herein and information submitted with this application is true and correct and the equipment listed herein complies or can be expected to comply with said rules and regulations when operated in the manner and under the circumstances proposed. If the project fees are required to be funded by the cost reimbursement basis, as the responsible person, I agree that I will pay the Santa Barbara County Air Pollution Control District the actual recorded cost, plus administrative cost, incurred by the APCD in the processing of the application within 30 days of the billing date. If I withdraw my application, I further understand that I shall inform the APCD in writing and I will be charged for all costs incurred through closure of the APCD files on the project.

For applications submitted for Authority to Construct, modifications to existing Authority to Construct, and Authority to Construct/Permit to Operate permits, I hereby certify that all major stationary sources in the state and all stationary sources in the air basin which are owned or operated by the applicant, or by an entity controlling, controlled by, or under common control with the applicant, are in compliance, or are on approved schedule for compliance with all applicable emission limitations and standards under the Clean Air Act (42 USC 7401 *et seq.*) and all applicable emission limitations and standards which are part of the State Implementation Plan approved by the Environmental Protection Agency.

Completed By: Katie Wilson Title: Environmental Engineer

Date: 3/8/10 Phone: 281-654-0742

Signature of Authorized Company Representative: Frank Betts

PLEASE NOTE THAT FAILURE TO COMPLETELY PROVIDE ALL REQUIRED INFORMATION OR FEES WILL RESULT IN YOUR APPLICATION BEING RETURNED OR DEEMED INCOMPLETE.

STATIONARY SOURCE SUMMARY
(Form 1302-A1)

APCD: Santa Barbara County Air Pollution Control District
COMPANY NAME: Pacific Offshore Pipeline Company

➢ APCD USE ONLY ≺

APCD IDS Processing ID:

Application #:

Date Application Received:

Application Filing Fee*:

Date Application Deemed Complete:

I. SOURCE IDENTIFICATION

1. Source Name: POPCO Gas Plant
2. Four digit SIC Code: 1311 USEPA AIRS Plant ID (for APCD use only): 3170
3. Parent Company (if different than Source Name): ExxonMobil Production Company (on behalf of POPCO)
4. Mailing Address of Responsible Official: P. O. Box 4358, Houston, TX 77210
5. Street Address of Source Location (include Zip Code): 12000 Calle Real, 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: ExxonMobil Production Company
10. Owner's Agent Name (if any): NA Title: Telephone #:
11. Responsible Official: Frank C. Betts Title: SYU Operations Supervisor Telephone #:(805) 961-4078
12. Plant Site Manager/Contact: Frank C. Betts Title: SYU Operations Supervisor Telephone #: (805) 961-4078
13. Type of facility: Oil and Gas Processing Facility
14. General description of processes/products: See Section 2 of Part 70 PTO 8092
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)? [X] Yes [ ] No
16. Is a Federal Risk Management Plan [pursuant to Section 112(r)] required? [ ] Not Applicable [X] Yes [ ] No
    (If yes, attach verification that Risk Management Plan is registered with appropriate agency or description of status of Risk Management Plan submittal.) *Verification regarding this submittal has already been submitted to the District.*

* 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: **Pacific Offshore Pipeline Company**	**SOURCE NAME: Exxon - SYU**

II. TYPE OF PERMIT ACTION

		CURRENT PERMIT (permit number)	EXPIRATION (date)
☐	**Initial SBCAPCD's Regulation XIII Application**		
☐	**Permit Renewal**		
☐	**Significant Permit Revision***		
X	**Minor Permit Revision***	8092 R7	6/12/2012
☐	**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:

POPCO replaced the single carbon canister unit associated with tank T-601 with a dual carbon canister system operated in series to ensure compliance with Rule 325.D as authorized under ATC 13163. This application seeks to allow for the continued operation of the system under Part 70/PTO 8092.

*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: Pacific Offshore Pipeline Company	SOURCE NAME: Exxon - SYU

I. TOTAL STATIONARY SOURCE EMISSIONS

Provide a brief description of operating scenario: A gas processing plant.

POLLUTANT* (name)	EMISSIONS (tons per year)	PRE-MODIFICATION EMISSIONS (tons per year)	EMISSIONS CHANGE (tons per year)
	No change in emissions requested for this application.		

* 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.

EXEMPT EMISSIONS UNITS
(Form 1302-H)

APCD: Santa Barbara County Air Pollution Control District	➢ APCD USE ONLY ≺ APCD IDS Processing ID:
COMPANY NAME: Pacific Offshore Pipeline Company	SOURCE NAME: Exxon - SYU

Are you claiming any emitting activities to be insignificant? (See definition at bottom of page)

YES ___X__ NO _____

I. ACTIVITIES CLAIMED TO BE INSIGNIFICANT (Attach supporting calculations)

Activity	Description of Activity/Emission Units	Potential to Emit for each Pollutant
See existing insignificant activity list/discussion in current permit. Table 5.9 – Estimated Exempt Emissions		

Insignificant activities are defined in APCD Rule 1301 (definitions). For an activity to be considered insignificant emissions cannot exceed 2 tons per year potential to emit (PTE) any criteria pollutants, and 0.5 tons per year for any regulated HAP.

Note: Insignificant activities are not exempt from Part 70 requirements/permits.

COMPLIANCE PLAN
(Form 1302-I1)

APCD: Santa Barbara County Air Pollution Control District	➢ APCD USE ONLY ≺ APCD IDS Processing ID:
COMPANY NAME: Pacific Offshore Pipeline Company	SOURCE NAME: Exxon - SYU

I. PROCEDURE FOR USING FORM 1302-I

☞ This form shall be submitted as part of the SBCAPCD's Regulation XIII Application. The Responsible Official shall identify the applicable federal requirement(s) to which the source is subject. In the Compliance Plan (Form 1302-I), a Responsible Official shall identify whether the source identified in the SBCAPCD's Regulation XIII Application currently operates in compliance with all applicable federal requirements.

II. APPLICABLE FEDERAL REQUIREMENTS

Applicable Federal Requirement[1]		Affected Emission Unit	In compliance?	Effective Date[4]
Regulatory Reference[2]	Regulation Title[2]		(yes/no/exempt[3])	
See section 3 of existing Part 70/APCD PTO 8092.				

1 Review APCD SIP Rules, NSPS, NESHAPS, and MACTs.
2 Regulatory Reference is the abbreviated citation (e.g. 40 CFR 60 Subpart OOO, APCD Rule 325.H) and Title is the prosaic title (e.g. NSPS Standards of Performance for Nonmetallic Mineral Processing Plants, Crude Oil Production and Separation, Inspection)
3 If exempt from applicable federal requirement, include explanation for exemption.
4 Indicate the date during the permit term that the applicable federal requirement will become effective for the emission unit.

Other Applicable Federal Requirements[5]	Affected Emission Unit	In compliance?	Effective Date

5 All environmentally significant permit conditions -- such as emission, operation, and throughput limitations or compliance monitoring conditions associated with such limitations -- listed in all authority to construct (ATC) permits issued to the Part 70 source are also applicable requirements.

*** If more than one page is used, please ensure that "Santa Barbara APCD", stationary source name and "Form 1302-I1" appear on each page. ***

COMPLIANCE PLAN
(Form 1302-I2)

APCD: Santa Barbara County Air Pollution Control District	➢ APCD USE ONLY ≺ APCD IDS Processing ID:
COMPANY NAME: Pacific Offshore Pipeline Company	SOURCE NAME: Exxon - SYU

III. COMPLIANCE CERTIFICATION

Under penalty of perjury, I certify the following:

X **Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s) with which the source is in compliance identified in form 1302-I1;**

☐ **Based on information and belief formed after reasonable inquiry, the source identified in this application will comply with the future-effective applicable federal requirement(s) identified in form 1302-I1, on a timely basis[1];**

☐ Based on information and belief formed after reasonable inquiry, the source identified in this application is not in compliance with the applicable federal requirement(s), identified in form 1302-I1, and I have attached a compliance plan schedule.[2]

Signature of Responsible Official — Date: 11 MAR 10

1. Unless a more detailed schedule is expressly required by the applicable federal requirement.

2. At the time of expected permit issuance, if the source expects to be out of compliance with an applicable federal requirement, the applicant is required to provide a compliance schedule with this application, with the following exception. A source which is operating under a variance that is effective for less than 90 days need not submit a Compliance Schedule. For sources operating under a variance, which is in effect for more than 90 days, the Compliance Schedule is the schedule that was approved as part of the variance granted by the hearing board.

   The compliance schedule shall contain a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with this applicable federal requirement. For sources operating under a variance, the compliance schedule is part of the variance granted by the hearing board. The compliance schedule shall resemble, and be at least as stringent as that contained in any judicial consent decree or administrative order to which the source is subject. For sources not operating under a variance, consult the Air Pollution Control Officer regarding procedures for obtaining a compliance schedule.

CERTIFICATION STATEMENT
(Form 1302-M)

APCD: Santa Barbara County Air Pollution Control District	➢ APCD USE ONLY ≺ APCD IDS PROCESSING ID:
COMPANY NAME: Pacific Offshore Pipeline Company	SOURCE NAME: Exxon - SYU

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
___ 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.

Signature of Responsible Official Frank Betts **Date** 11 MAR 10

Print Name of Responsible Official: Frank C. Betts

Title of Responsible Official and Company Name: SYU Operations Supervisor

(Form 1302-M continued)

APCD: Santa Barbara County Air Pollution Control District	➢ APCD USE ONLY ≺ APCD IDS PROCESSING ID:
COMPANY NAME: Pacific Offshore Pipeline Company	SOURCE NAME: Exxon - SYU

List Other Forms or Attachments (cont.)

Attachment I: Application Supporting Documentation

Attachment I
Part 70 and APCD PTO APPLICATION
ExxonMobil – POPCO Gas Plant
PART 70/APCD PTO No. 8092 R7

INTRODUCTION

Per the requirements of Condition 7 (Source Compliance Demonstration Period) in ATC 13163, Pacific Offshore Pipeline Company (POPCO) is submitting this Part 70 and APCD PTO application to allow ongoing operation of the dual carbon canister system installed under ATC 13163. This system was installed in order to demonstrate compliance with the control requirements of Rule 325.D.1 and D.2 and in accordance with PTO/ Part 70 permit No. 8092 R6 permit conditions 9.C.5.(b)(iii) and (iv).

BACKGROUND

Tank T-601 has a capacity of 91,400 gallons and it usually receives water from the Sour Water Stripper (SWS) treatment system, as well as, water from the boiler blowdown and boiler feed water systems. The majority of throughput into tank T-601 is from the boiler blowdowns. Boiler blowdown water is non-hazardous and does not contain any appreciable hydrocarbons or sulfides but it does have relatively high solids content due to solids concentration from its use to make steam. Tank T-601 currently has one carbon canister to control any odors and hydrocarbons from the SWS treatment system.

SOURCE TEST RESULTS

POPCO completed source testing on December 31, 2009 in accordance with the requirements of ATC 13163. The source test report has been provided as an appendix to this document which demonstrates compliance with the limits of ATC 13163 and Rule 325.

Table 1 – Summary of Source Test Results for Carbon Adsorption Air Pollution Control System on POPCO Tank T-601

Parameter	Units	APC Inlet	APC Outlet	Emission Reduction	Permit Requirement
VOC	ppmv	620	< 1.0	99.8%	> 90%
VOC	lb/hr	0.004	0.000	--	--
H_2S	ppmv	--	< 0.05	--	< 13

PROPOSED CHANGES

Under ATC 13163, the existing single 60-70 pound carbon canister associated with tank T-601 was replaced with a Calgon Ventsorb dual carbon canister system operated in series to demonstrate compliance with Rule 325 and existing permit conditions as noted above. As described in ATC 13163, POPCO is monitoring the outlet of each canister weekly for THC, methane, and hydrogen sulfide. POPCO is not requesting any additional changes at this time.

PROJECT EMISSIONS

There are no increases in emissions associated with this project. POPCO proposes no changes in permitted emissions.

COMPLIANCE WITH DISTRICT RULES AND REGULATIONS

The project will continue to comply with applicable SBC APCD rules and regulations, including rules outlined under Regulations II, III, VIII, and XIII. Compliance relative to the following rules and regulations are detailed below:

Rule 201 – Permits Required – This application satisfies the requirement to obtain a PTO in order to continue operation of the carbon canisters permitted under ATC 13163.

Rule 210 – Fees – ExxonMobil requests that any fees associated with processing this application be billed to ExxonMobil's account.

Rule 325 – Crude Oil Production and Separation - This rule applies to equipment used in the production, processing, separation, gathering, and storage of oil and gas prior to custody transfer. The rule requires applicable equipment to be connected to a fuel gas system, underground injection, a flare, or to a system such as carbon canisters. The source testing completed per ATC 13163 demonstrate compliance with 90 percent control efficiency as specified in Rule 325.D.

Rule 802 – Nonattainment Review – There are no emission increases associated with this project, therefore BACT and AQIA reviews are not required. No offsets are required for this project.

Regulation XIII – Part 70 Operating Permit Program – These proposed changes constitute a minor Part 70 permit modification under Rule 1301. As required by Rule 1304 Section D.3, the Part 70 application forms for the proposed change are enclosed.

Appendix A

Summary of Source Test Results on T-601

SOURCE TEST REPORT

BI-ANNUAL ROC AND H2S COMPLIANCE REPORT FOR THE CARBON ADSORPTION SYSTEM SERVING WASTEWATER TANK T-601 LOCATED AT THE LAS FLORES CANYON GAS TREATMENT FACILITY

Prepared for:

ExxonMobil/POPCO
12000 Calle Real
Goleta, CA 93117

Test Date: December 31, 2009

Prepared by:

ERM

1351 South Grove Ave.
Suite 110
Ontario, CA 91761
Project No.: 0110540

Test Firm Signature:

Jason R. Wirth
ERM-West, Inc.
Senior Technical Specialist

PROJECT REPORT COMPLIANCE REVIEW

This is to confirm that all data collected for this project were taken in accordance with the test protocol. All data has been audited for entry accuracy and all computer spreadsheets have been validated.

_____ Date:_____

Jason R. Wirth
ERM-West, Inc.
Senior Technical Specialist

I have reviewed this report to ensure that the scope of work has been met, that the findings are supported by adequate technical information and that the appropriate quality assurance procedures have been followed.

_____ Date:_____

Brian L. Story
ERM-West, Inc.
Project Engineer

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List of Acronyms

acfm	actual cubic feet per minute
ATC	authority to construct
APC	carbon adsorption air pollution control system
dscfm	dry standard cubic feet per minute
ERM	ERM-West, Incorporated
H_2S	hydrogen sulfide
POPCO	Pacific Offshore Pipeline Company
QA/QC	quality assurance/quality control
RE	removal efficiency
ROC	reactive organic compound
SBCAPCD	Santa Barbara County Air Pollution Control District
TGNMO	total gaseous non-methane organics
T-601	POPCO Wastewater Tank No. T-601
wscfh	wet standard cubic feet per hour
USEPA	United States Environmental Protection Agency

EXECUTIVE SUMMARY

ERM-West, Incorporated (ERM) was retained by Pacific Offshore Pipeline Company (POPCO) to conduct source emissions testing for reactive organic compounds (ROC) and hydrogen sulfide (H_2S) for the carbon adsorption air pollution control system (APC) serving Wastewater Tank No. T-601 (T-601) at the Las Flores Canyon Gas Treatment Plant located in Goleta, California. The test program was designed to meet the requirements of Santa Barbara County Air Pollution Control District (SBCAPCD) Authority to Construct (ATC) No. 13163. Testing was conducted on Thursday, December 31, 2009.

The objectives of the test program were the following:

(a) determine concentrations of ROC at the inlet and outlet of the APC;
(b) determine concentrations of H_2S at the outlet of the APC;
(c) determine gaseous volumetric flow rates at the inlet and outlet of the APC for use in calculating the mass emission rates of ROC; and
(d) calculate the ROC removal efficiency (RE) for the APC.

A total of three, 40-minute runs were conducted. Each run consisted of collecting an integrated Tedlar bag sample for ROC at the APC inlet and outlet locations simultaneously, collecting an integrated Tedlar bag sample for H_2S at the APC outlet location only, and measurement of gaseous volumetric flow rate utilizing United States Environmental Protection Agency (USEPA) Method 2D at the APC inlet and outlet locations simultaneously.

Testing was conducted while the facility was operating under representative conditions. Sampling was conducted while the outlet pump serving T-601 was shutdown to maximize exhaust flow from the tank.

The average ROC concentration at the APC inlet location was determined to be 620 parts per million by volume (ppmv), expressed as total gaseous non-methane organic compounds (TGNMO) as methane. The average gaseous volumetric flow rate measured for the APC inlet was 2.82 dry standard cubic feet per minute (dscfm). Based on these data, the ROC mass emission rate at the APC inlet was calculated to be 0.004 pounds per hour (lb/hr), calculated as TGNMO as methane.

The average ROC concentration at the APC outlet location was reported as "not detected" (ND). For emissions reporting purposes, the practical quantitation limit (PQL) of 1.0 ppmv reported by the laboratory was utilized for calculating mass emissions. The average gaseous volumetric flow rate

measured for the APC outlet was 2.64 dscfm. Based on these data, the ROC mass emission rate at the APC outlet was calculated to be 0.000 lb/hr, calculated as TGNMO as methane. This value is in compliance with the limitations set forth within SBCAPCD ATC No. 13163, Condition No. 1(a) which limits the mass emission rate of ROC at the APC outlet to a maximum of 0.06 lb/hr.

The resulting ROC RE for the APC was determined to be 99.8 percent on a mass basis. This value is in compliance with the limitations set forth within SBCAPCD ATC No. 13163, Condition No. 2(a) which requires a minimum ROC RE of 90 percent on a mass basis.

The average H_2S concentration at the APC outlet location was reported as "not detected" (ND). For emissions reporting purposes, the practical quantitation limit (PQL) of 0.05 ppmv reported by the laboratory was utilized. This value is in compliance with the limitations set forth within SBCAPCD ATC No. 13163, Condition No. 2(c) which limits the concentration of H_2S at the APC outlet to a maximum of 13 ppmv.

Table ES-1 presents a summary of results for the compliance testing performed for the APC serving T-601.

Table ES-1. POPCO Wastewater Tank No. T-601 – Carbon Adsorption Air Pollution Control System - Test Results Summary for 12/31/09

Parameter	Units	APC Inlet	APC Outlet	RE	Permit Requirement
Volatile Organic Compounds (VOC), TGNMO as methane[a]	ppmv lb/hr	620 0.004	< 1.0 0.000	99.8%	> 90.0%
Hydrogen Sulfide (H_2S)[b]	ppmv	-	< 0.05	-	< 13

(a) VOC concentrations at the APC outlet location were reported as "not detected" (ND) for Run Nos. 1-3. For emissions reporting purposes, the PQL of 1.0 ppmv reported by the laboratory was utilized for calculating mass emissions. Actual emissions should be considered "less than" the reported value.

(b) H_2S concentrations at the APC outlet location were reported as "not detected" (ND) for Run Nos. 1-3. For emissions reporting purposes, the PQL of 0.05 ppmv reported by the laboratory was utilized. Actual emissions should be considered "less than" the reported value.

1.0 INTRODUCTION

ERM-West, Inc. (ERM) is submitting this source test report on behalf of Pacific Offshore Pipeline Company (POPCO) for the bi-annual compliance testing performed on the carbon adsorption air pollution control system (APC) serving Wastewater Tank No. T-601 (T-601). The equipment is located at the Las Flores Canyon Gas Treatment Plant located in Goleta, California. The testing followed the procedures outlined in the approved source test protocol submitted to Santa Barbara County Air pollution Control district (SBCAPCD) in December 2009. The following document describes the purpose of testing, facility description and source information, result summaries, test methods, and relevant quality assurance/quality control procedures.

The test program was designed to meet the requirements of SBCAPCD Authority to Construct (ATC) No. 13163 by accomplishing the following objectives:

(a) determine concentrations of ROC at the inlet and outlet of the APC;
(b) determine concentrations of H_2S at the outlet of the APC;
(c) determine gaseous volumetric flow rates at the inlet and outlet of the APC for use in calculating the mass emission rates of ROC; and
(d) calculate the ROC removal efficiency (RE) for the APC.

Table 1-1 presents a sampling matrix, which details the sources tested, schedule, and methods used for this project.

Table 1-1. POPCO Wastewater Tank No. T-601 Carbon Adsorption Air Pollution Control System - Compliance Sampling Matrix for 12-31-2009

Test Location	Parameter	Test Method	Test Date	No. of Tests	Run Time	Analytical Method
T-601 APC Inlet	Flow Rate Moisture ROC	USEPA M2D USEPA M4 USEPA M18	Dec. 31	3	40	DGM Totalizing Wet/Dry Bulb GC-FID
T-601 APC Outlet	Flow Rate Moisture ROC H_2S	USEPA M2D USEPA M4 USEPA M18 USEPA Method 15/16	Dec. 31	3	40	DGM Totalizing Wet/Dry Bulb GC-FID GC-MS

2.0 FACILITY AND SOURCE INFORMATION

2.1 FACILITY DESCRIPTION

The POPCO Las Flores Canyon Gas Treatment Plant is a sour gas sweetening process and by-product recovery facility. H_2S and carbon dioxide (CO_2) are removed from the gas produced from a federal OCS platform. The H_2S is converted to sulfur, which is recovered as the main by-product.

2.2 SOURCE DESCRIPTION

Acid gas generated in the sour gas sweetening process is treated in a Claus/Beavon sulfur removal unit (SRU) to remove sulfur compounds for the waste gas stream. All water removed during the sour gas treating process (V-A401, A-A401, V123, V-A501, etc.) goes to the sour water stripper (V-601) where the water is treated in a steam contactor.

Wastewater from the sour water stripper, boiler blow down operations, and water softening are routed to T-601 and then piped to the ExxonMobil water plant for processing. T-601 has a diameter of 25 feet and a depth of 29 feet with a nominal capacity of 91,800 gallons. During normal operations, the tank is maintained on automatic level control of approximately 14 percent.

Boiler blow down operations are automatically controlled by a conductivity analyzer that purges water form the boiler feed drum to lower the conductivity of the water. The boiler blow down water is routed through a ½-inch line to the sour water stripper outlet line and then to T-601. The majority of the water stored in T-601 comes from the sour water stripper at a rate of approximately 7 gallons per minute (gpm).

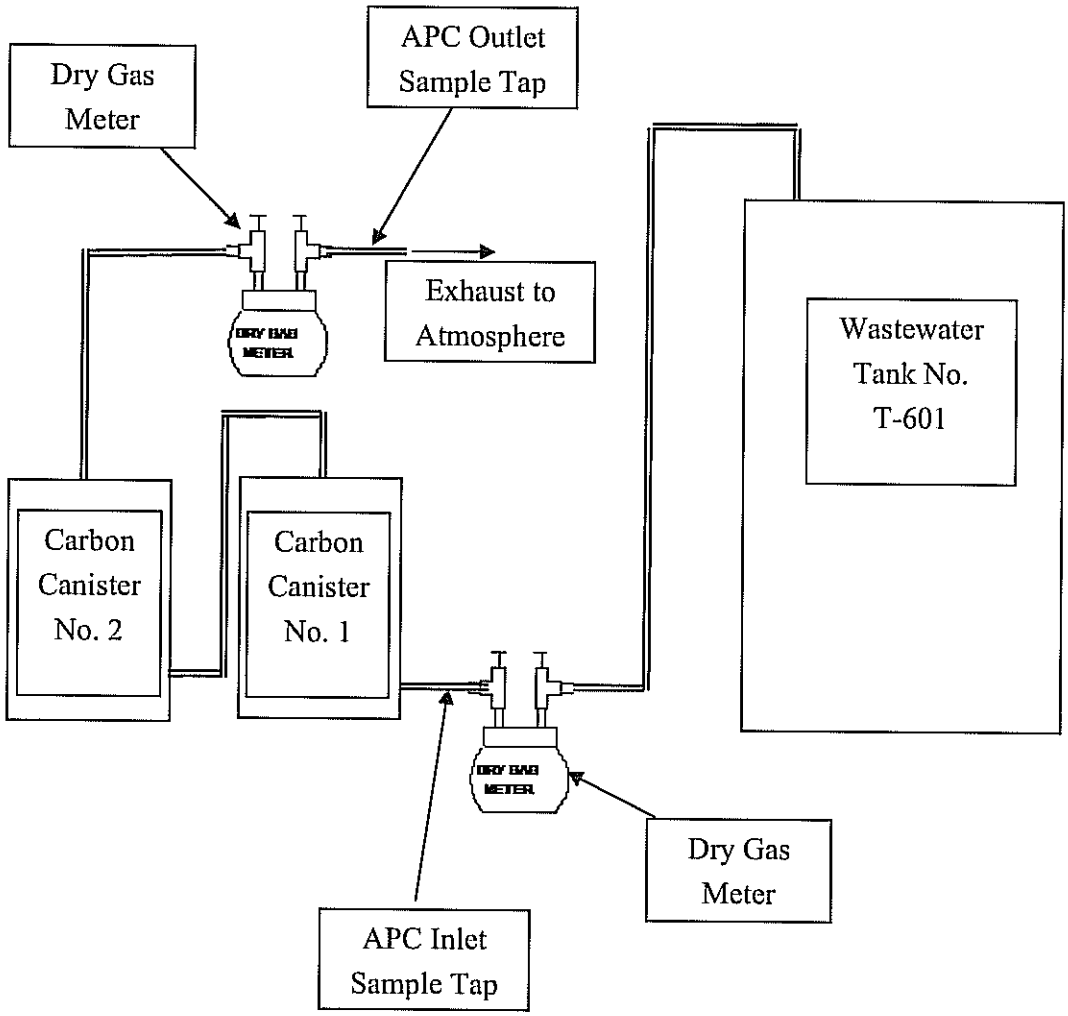
2.3 CONTROL EQUIPMENT DESCRIPTION

The headspace of T-601 contains an exhaust vent that is equipped with two activated carbon canisters in series to minimize H_2S emissions and reduce ROC emissions by a minimum of 90 percent on a mass basis.

2.4 SAMPLING POINT LOCATIONS

Sampling was conducted at the T-601 APC inlet location upstream of the first carbon canister and at the APC outlet location downstream of the second carbon canister. Figure 2-1 presents a diagram of the T-601 APC system and the sample locations.

Figure 2-1. POPCO Wastewater Tank No. T-601 Carbon Adsorption APC - Sampling Locations



3.0 DISCUSSION AND SUMMARY OF RESULTS

3.1 SUMMARY OF FIELD TEST PROCEDURES

The compliance testing was conducted on Thursday, December 31, 2009. The ERM test crew arrived in the morning to meet with Mr. John Deacon (ExxonMobil/POPCO representative) and to coordinate the testing efforts. The equipment was then set up at the T-601 APC inlet and outlet sample locations and preliminary measurements were obtained. The outlet pump serving T-601 was verified to be in the "off" position prior to the initiation of sampling to ensure positive gaseous flow through the carbon adsorption system.

A total of three, 40-minute runs were conducted. Each run consisted of collecting an integrated Tedlar bag sample for ROC at the T-601 APC inlet and outlet locations simultaneously, collecting an integrated Tedlar bag sample for H_2S at the APC outlet location only, and measurement of gaseous volumetric flow rate utilizing United States Environmental Protection Agency (USEPA) Method 2D at the APC inlet and outlet locations simultaneously.

3.2 SUMMARY OF RESULTS

The average ROC concentration at the APC inlet location was determined to be 620 parts per million by volume (ppmv), expressed as total gaseous non-methane organic compounds (TGNMO) as methane. The average gaseous volumetric flow rate measured for the APC inlet was 2.82 dry standard cubic feet per minute (dscfm). Based on these data, the ROC mass emission rate at the APC inlet was calculated to be 0.004 pounds per hour (lb/hr), calculated as TGNMO as methane.

The average ROC concentration at the APC outlet location was reported as "not detected" (ND). For emissions reporting purposes, the practical quantitation limit (PQL) of 1.0 ppmv reported by the laboratory was utilized for calculating mass emissions. The average gaseous volumetric flow rate measured for the APC outlet was 2.64 dscfm. Based on these data, the ROC mass emission rate at the APC outlet was calculated to be 0.000 lb/hr, calculated as TGNMO as methane. This value is in compliance with the limitations set forth within SBCAPCD ATC No. 13163, Condition No. 1(a) which limits the mass emission rate of ROC at the APC outlet to a maximum of 0.06 lb/hr.

The resulting ROC RE for the APC was determined to be 99.8 percent on a mass basis. This value is in compliance with the limitations set forth within SBCAPCD ATC No. 13163, Condition No. 2(a) which requires a minimum ROC RE of 90 percent on a mass basis.
The average H_2S concentration at the APC outlet location was reported as "not detected" (ND). For

emissions reporting purposes, the practical quantitation limit (PQL) of 0.05 ppmv reported by the laboratory was utilized. This value is in compliance with the limitations set forth within SBCAPCD ATC No. 13163, Condition No. 2(c) which limits the concentration of H_2S at the APC outlet to a maximum concentration of 13 ppmv.

Table 3-1 presents a summary of each test run performed on the T-601 APC.

Table 3-1. POPCO Wastewater Tank No. T-601 Carbon Adsorption Air Pollution Control System
Source Test Results Summary – December 31, 2009

Test Parameter	Units	Run 1		Run 2		Run 3		Average	
		Inlet	Outlet	Inlet	Outlet	Inlet	Outlet	Inlet	Outlet
Date Tested	NA	12/31/2010	12/31/2010	12/31/2010	12/31/2010	12/31/2010	12/31/2010	-	-
Time	NA	1323-1403	1323-1403	1409-1449	1409-1449	1457-1537	1457-1537	-	-
Stack Temperature	°F	66	72	65	77	64	80	65	76
Moisture Content	%	1.9%	2.2%	2.0%	2.7%	1.7%	2.0%	1.9%	2.3%
Flowrate	acfm	3.53	3.38	2.91	2.81	2.17	2.11	2.87	2.77
	dscfm	3.46	3.25	2.86	2.67	2.15	2.01	2.82	2.64
Stack Gas Content									
VOC, TGNMO as methane[a]	ppmv	594	1.0	638	1.0	629	1.0	620	1.0
H_2S[b]	ppmv	-	0.05	-	0.05	-	0.05	-	0.05
Emissions									
VOC Emissions, TGNMO as methane	lb/hr	0.005	0.000	0.005	0.000	0.003	0.000	0.004	0.000
H_2S Emissions	lb/hr	-	0.000	-	0.00	-	0.00	-	0.00
Destruction Removal Efficiency (DRE)									
VOC Removal Efficiency *(mass basis)*	%	99.8%		99.9%		99.9%		99.8%	

(a) VOC concentrations were reported as "not detected" (ND) at the APC outlet for Run Nos. 1-3. For reporting purposes, the practical quantitation limit (PQL) of 1.0 ppmv reported by the laboratory was utilized for calculating mass emissions. The resulting values should be considered "less than" the reported values.

(b) H_2S concentrations were reported as "not detected" (ND) at the APC outlet for Run Nos. 1-3. For reporting purposes, the practical quantitation limit (PQL) of 0.05 ppmv reported by the laboratory was utilized. The resulting values should be considered "less than" the reported values.

4.0 TESTING PROCEDURES

4.1 EPA METHOD 2D: DETERMINATION OF GAS VOLUME FLOW RATES IN SMALL PIPES AND DUCTS

This method applies to the measurement of gas flow rates in small pipes and ducts. The entire gas flow in the exhaust was directed through a calibrated dry gas meter. The gas meter temperature and pressure measurements were recorded to correct the gas volume to standard conditions (i.e., 60 degrees Fahrenheit and 29.92 inches of mercury). Stack gas moisture measurements were made at the beginning and end of each test using a wet/dry bulb thermometer. The gas meter volume for each test was corrected for moisture content and reported on a dry basis. Figure 2-1 presents a schematic of the USEPA Method 2D sampling approach.

4.2 USEPA METHOD 18: EXHAUST SAMPLING FOR ROC AND H_2S

The gaseous samples at the inlet and outlet locations were extracted using 5-liter Tedlar sampling bags. A 1/4-inch Teflon sampling line was connected to the sampling tap that was installed on both the inlet and outlet gas transfer lines serving the APC. The existence of positive pressure within the gas streams allowed sample to flow through the Teflon sample line and into the Tedlar sampling bags without the use of powered pumps. Rotameters were used to regulate the sample flow rate into the sample bags. A T-connection was utilized at the outlet sampling location to allow the filling of two Tedlar sample bags simultaneously, one analyzed for ROC and the other for H_2S content.

The samples were delivered to Oilfield Environmental and Compliance, Inc. (OEC) located in Santa Maria, California and were analyzed for $C_1 - C_{10+}$ hydrocarbons using gas chromatography with a flame ionization detector (GC-FID). H_2S samples were analyzed by the same analytical laboratory utilizing gas chromatography-mass spectrometry (GS-MS).

4.3 USEPA METHOD 4: DETERMINATION OF MOISTURE CONTENT IN STACK GASES

For this test program, moisture content at each sample location was determined using wet bulb and dry bulb measurements. The moisture content of the stack gas was calculated using wet-bulb/dry-bulb temperature measurements utilizing a psychrometric chart analysis and a saturation vapor pressure over water curve. The relative humidity was determined from the psychrometric chart at the intersection of the wet and dry bulb temperatures. The saturation vapor pressure was then obtained from the saturation vapor pressure over water curve at the dry bulb temperature. The moisture content of the stack gas was calculated by multiplying the relative humidity by the saturation vapor pressure, then dividing by the absolute stack pressure.

5.0 CALCULATIONS

5.1 SAMPLE VOLUME AND STACK GAS FLOW RATES

- **Sample gas volume, dscf**

$$Vstd = 0.03342 * Vm\left(Pb + \frac{H}{13.6}\right)\left(\frac{Tref}{Tm}\right) * Y$$

- **Moisture content, %**

$$Bws = RH * \frac{S.V.P}{Ps}$$

- **Stack gas molecular weight, lb/lb-mole**

$$MW_{dry} = 0.44*(CO_2\%) + 0.32*(O_2\%) + 0.28*(N_2\%)$$
$$MW_{wet} = MW_{dry} *(1-B_{ws}) + 18*B_{ws}$$

- **Absolute stack pressure, inches of mercury (in. Hg.)**

$$Ps = Pb + \frac{Psg}{13.6}$$

- **Actual stack flow rate, acfm**

$$Q = \frac{Vm}{\theta}$$

- **Dry standard stack gas flow rate, dscfm**

$$Qsd = Q * (1 - Bws) * \left(\frac{Tref}{Ts}\right) * \left(\frac{Ps}{29.92}\right)$$

5.2 EMISSIONS

- **Mass Emissions**

$$lbs/hr = ppm_i * 10^{-6} * \left(\frac{MW_i}{SV}\right) * Qsd * 60\,\text{min}/hr$$

Where:

SV = Specific molar volume of an ideal gas
385.3 ft^3/lb-mole for T_{ref} =528°F
379.5 ft^3/lb-mole for T_{ref} =520°F
MWi =Molecular weight, lb/lb-mole

5.3 NOMENCLATURE

B_{ws} = flue gas moisture content
M_i = mass emissions of species i, lb/hr
MW = molecular weight of flue gas
MW_i = molecular weight of species i:

NO_x	=	46
CO	=	28
SO_x	=	64
H_2O	=	18
C	=	12

θ = sample time, min.
P_{bar} = barometric pressure, in. Hg.
P_s = stack absolute pressure, in. Hg.
P_{sg} = stack static pressure, in. H_2O
Q = wet stack gas flow rate at actual conditions, acfm
Q_{sd} = dry stack gas flow rate at standard conditions, dscfm
SV = specific molar volume of an ideal gas at standard conditions, ft^3/lb-mole
T_m = average meter temperature, ^oR
T_{ref} = reference temperature, ^oR (520 or 528)
V_m = dry meter volume uncorrected, dcf
$V_{m\,std}$ = dry meter volume corrected to standard conditions, dscf
$V_{w\,std}$ = volume of water vapor at standard conditions, scf
Y = meter calibration coefficient

6.0 QUALITY ASSURANCE AND QUALITY CONTROL

6.1 SAMPLING PROTOCOL

ERM is organized to facilitate sample management, analytical performance management, and data management. Personnel are assigned specific tasks to ensure implementation of the QA/QC program. The Manager of Air Measurements in charge of air emission measurements reports directly to the Director of Air Services and is the QA officer responsible for program effectiveness and compliance.

The analyst performs the analyses and initial data review. Each analyst must check and initial their work, making certain that it is complete, determining that any instrumentation has been properly calibrated, and ensuring that the analysis has been performed within the QA/QC limits.

The Manager of Air Measurements evaluates the data submitted by the analyst by first assessing the validity of the analytical method chosen for the analysis. The Manager of Air Measurements then verifies that the data and documentation are complete, verifies that each analysis has been performed within QA criteria specific to each method, checks calculations, assembles and signs the data package and prepares the report.

6.2 EQUIPMENT MAINTENANCE AND CALIBRATION

The Field Supervisor and Field Technicians are in charge of routine maintenance and calibrations of all source testing equipment. Relevant calibration information is included in the appendices of this report.

6.2.1 Equipment Maintenance

All major pieces of equipment have maintenance logs where all maintenance activities are recorded and documented. Table 6-1 presents the routine maintenance that is performed on ERM source testing equipment.

Table 6-1. Test Equipment - Routine Maintenance Schedule

Equipment	Acceptance Limits	Frequency of Service	Methods of Service
Pump	• Absence of leaks • Ability to draw vacuum within equipment specifications	Every 500 hours of operation or 6-months, whichever is less	• Visual inspection
Flow Meter	• Free mechanical movement • Absence of malfunction	Every 500 hours of operation or 6-months whichever is less	• Visual inspection • Clean • Calibrate
Sampling Instrumentation	• Absence of malfunction • Proper response to zero, mid-level, and span gases	As recommended by manufacturer or when required due to unacceptable limits	• As recommended by manufacturer
Mobile Laboratory Sampling System	• Absence of leaks. • Proper input flow rates to analyzers	Depends on nature of use.	• Change filters • Change gas dryer • Leak check • Check for contamination
Sample Lines	• Absence of soot and particulate buildup • Adequate sample flow	Depends on nature of use.	• Flush with solvents and water • Purge line with nitrogen

6.2.2 Equipment Calibration

Current calibration information on equipment used during testing is included in the appendices of this report.

The S-Type pitot tubes are calibrated initially upon purchase and then semiannually. Visual measurements are taken prior to each use to insure accidental damage has not occurred. Measurements are performed using a micrometer and protractor.

Each temperature sensor is marked and identified. This is done by marking each thermocouple end connector with a number. The sensor is calibrated as a unit with the control box potentiometer and associated lead wire as an identified unit. Calibrations are performed initially and annually at three set-points over the range of expected temperatures for that particular thermocouple. A reference output-voltage/thermocouple calibrator is used

as a temperature reference source for the multi-point calibrations.

The field barometer is adjusted initially and semiannually to within 0.1 inches of mercury of the actual atmospheric pressure. All dry gas field meters are calibrated before initial use. Once the meter is placed in operation its calibration is checked after each test series or bimonthly, whichever is less.

Dry gas meters are calibrated against a NIST reference meter or orifice. The dry gas meter orifice is calibrated before its initial use and then annually. This calibration is performed during the calibration of the dry gas test meter. The unit is checked in the field after every series of tests using a field gas-meter check procedure.

Analytical balances are internally calibrated prior to use following the manufacturer's instructions. The balances are further checked using Class S-1 analytical weights prior to daily usage. Field top loading balances are checked with a field analytical weight prior to usage.

6.3 DATA VALIDATION

The data presented on final reports are reviewed three times. First, the analyst reviews and certifies that the raw data complies to technical controls, documentation requirements, and standard group procedures. Second, the Manager of Air Measurements reviews and certifies that data packages comply to specifications for sample holding conditions, chain of custody, data documentation, and the final report is free of transcription errors. Third, a QA review is performed by senior personnel. This review thoroughly examines the entire completed data report. Once the review process is completed, the report is approved by ERM senior personnel and issued. All raw laboratory data and final reports are stored for a minimum of 5 years.