



JUL 22 2013

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

Re: **Proposed Authorities to Construct / Certificate of Conformity (Minor Mod)**
District Facility # S-1738
Project # S-1131066

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authorities to Construct for Vintage Production California LLC, located at Wheeler Ridge facility within the Light Oil Western stationary source (Section: 28, Township: 11N, Range: 20W), which has been issued a Title V permit. Vintage Production California LLC is requesting that a Certificate of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. The modification consist of the installation of one 1000 bbl and one 2000 bbl fixed roof crude oil tank connected to the vapor control system listed on Permit S-1738-37-9.

Enclosed is the engineering evaluation of this application, a copy of the current Title V permit, and proposed Authorities to Construct # S-1738-37-9, '-464-0, and '-465-0 with Certificate 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.

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

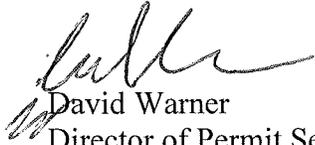
Tel: 661-392-5500 FAX: 661-392-5585

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Mr. Gerardo C. Rios
Page 2

Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Warner", is written over the printed name and title.

David Warner
Director of Permit Services

Enclosures
cc: Steve Davidson, Permit Services



JUL 22 2013

Phil Acosta
Vintage Production California LLC
9600 Ming Ave., Suite 300
Bakersfield, CA 93311

**Re: Proposed Authorities to Construct / Certificate of Conformity (Minor Mod)
District Facility # S-1738
Project # S-1131066**

Dear Mr. Acosta:

Enclosed for your review is the District's analysis of your application for Authorities to Construct for the facility identified above. You have requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The modification consist of the installation of one 1000 bbl and one 2000 bbl fixed roof crude oil tank connected to the vapor control system listed on Permit S-1738-37-9.

After addressing any EPA comments made during the 45-day comment period, the Authorities to Construct will be issued to the facility with a Certificate 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

Enclosures
cc: Steve Davidson, Permit Services

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II. Applicable Rules

- Rule 2201 New and Modified Stationary Source Review Rule (4/21/11)
- Rule 2520 Federally Mandated Operating Permits (6/21/01)
- Rule 2410 Prevention of Significant Deterioration (Adopted 6/16/11, effective 11/26/12)
- Rule 4001 New Source Performance Standards (4/14/99)

40 CFR Part 60, Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 – **Not Applicable** - capacity of the tanks is \leq 420,000 gallons, and crude oil is stored prior to custody transfer; therefore, this subpart does not apply to the tanks in this project.

Subpart OOOO (Adopted 8/16/2012) - Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution. **Not Applicable** – emissions are less than 6 tons per year.

- Rule 4101 Visible Emissions (04/20/05)
- Rule 4102 Nuisance (12/17/92)
- Rule 4409 Components at Light Crude Oil Production Facilities, Natural Gas Production Facilities, and Natural Gas Processing Facilities (4/20/05)
- Rule 4623 Storage of Organic Liquids (5/19/05)
- CH&SC 41700 Health Risk Assessment
- CH&SC 42301.6 School Notice
- Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
- California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. Project Location

The tanks will be located at the Wheeler Ridge facility within the Light Oil Western stationary source (Section: 28, Township: 11N, Range: 20W). The facility is not located within 1,000 feet of the outer boundary of any K-12 school, therefore, pursuant to CH&SC 42301.6, California Health and Safety Code (School Notice), public notification is not required.

IV. Process Description

The facility separates the produced crude oil from the produced water. The clean (dry) crude oil is stored in tanks for shipment to refineries or pipeline. The produced water is treated and disposed of in accordance with state and federal regulations.

Vapor recovery systems collect produced vapors from the production wells and storage tanks, condense out the entrained liquids and route the non-condensable vapors to a sales gal pipeline or to a flare for incineration. Storage tanks and associated vapor control

systems are designed to operate 24 hours per day every day of the year.

V. Equipment Listing

Pre-Project Equipment Description:

S-1738-37-7: 84,000 GALLON FIXED ROOF PETROLEUM STORAGE TANK #2124 SERVED BY VAPOR RECOVERY SYSTEM INCLUDING 7.5 HP VAPOR COMPRESSOR (CENTRAL PLANT)

Proposed Modification:

Connect new tanks S-1738-464 and '-465 to the vapor control system listed on tank S-1738-37.

S-1738-37-9: MODIFICATION OF 2000 BBL FIXED ROOF PETROLEUM STORAGE TANK (#2124) SERVED BY VAPOR RECOVERY SYSTEM INCLUDING 7.5 HP VAPOR COMPRESSOR (CENTRAL PLANT): CONNECT TANKS S-1738-464-0 AND '-465-0 TO THE VAPOR CONTROL SYSTEM

Post Project Equipment Description:

S-1738-37-9: 2000 BBL FIXED ROOF PETROLEUM STORAGE TANK (#2124) WITH VAPOR CONTROL SYSTEM SHARED WITH TANKS S-1738-464-0 AND '-465-0

S-1738-464-0: 1,000 BBL FIXED ROOF CRUDE OIL STORAGE TANK SERVED BY THE VAPOR CONTROL SYSTEM LISTED ON PERMIT S-1738-37

S-1738-465-0: 2,000 BBL FIXED ROOF CRUDE OIL STORAGE TANK SERVED BY THE VAPOR CONTROL SYSTEM LISTED ON PERMIT S-1738-37

VI. Emission Control Technology Evaluation

The subject tanks are vented to vapor control system that incinerates the vapors in IC engines or routes it to a sales line. Pursuant to the District's crude oil storage tank BACT guidelines, this is considered to be 99% control; therefore, the applicant's request to increase the tanks' vapor control efficiency to 99% will be granted.

VII. General Calculations

Per FYI-111, modifying the tank vapor control system to connect a new tank to the system is not a NSR modification; therefore, tank S-1738-37-9 is not being modified and does not require calculations

A. Assumptions:

- Facility will operate 24 hours per day, 7 days per week, and 52 weeks per year.
- The fugitive emissions for all tanks are calculated using California Implementation Guidelines for Estimating Mass Emissions of fugitive Hydrocarbon Leaks at Petroleum Facilities, CAPCOA/CARB, February 1999 “revised screening” emissions factors.
- Only fugitive VOCs emitted from components in gas service are calculated.
- Fugitive emissions from heavy oil liquid service components are negligible.
- The percentage of VOCs of the total hydrocarbons is 100%. (see gas analysis in Attachment IV).

C. **Calculations**

1. Pre-Project Potential to Emit (PE1)

Since S-1738-464 and ‘-465 these are new emissions units, PE1 = 0.0 lb/day for all pollutants.

2. Post Project Potential to Emit (PE2) - Attachment V

Post-project potential to emit is calculated based on the fugitive component counts. The following table summarizes the post-project potential to emit for units included in this project.

Permit Unit	VOC - Daily PE2 (lb/day)	VOC - Annual PE2 (lb/Year)
S-1738-464-0	0.3	110
S-1738-465-0	0.3	110

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

Pursuant to District Rule 2201, the 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 (ERC) 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.

Facility emissions are already above the Offset and Major Source Thresholds for VOC emissions; therefore, SSPE1 calculations are not necessary.

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 (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 (ERC) which have been banked since

September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

The source is an existing Major Source for VOC's and therefore is neither becoming a Major Source nor surpassing the offset threshold for VOC's as a result of this project. Therefore SSPE2 calculations are not necessary.

5. Major Source Determination

Rule 2201 Major Source Determination:

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following shall not be included:

- any ERCs associated with the stationary source
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165

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.

Rule 2410 Major Source Determination:

Since this source is not included in the 28 specific source categories specified in 40 CFR 51.165, the increases in fugitive emissions are not included in the Rule 2410 Prevention of Significant Deterioration (PSD) Applicability determination. All post project emissions associated with this project are fugitive emissions; therefore, a Rule 2410 Prevention of Significant Deterioration (PSD) Applicability determination is not required.

6. Baseline Emissions (BE)

The BE calculation (in lbs/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 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.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to District Rule 2201.

S-1738-464-0 and through '-465-0:

Since these are new emissions units, BE = PE1 = 0 for all pollutants.

7. SB 288 Major Modification

SB 288 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."

Since this source is not included in the 28 specific source categories specified in 40 CFR 51.165, the increases in fugitive emissions are not included in the SB 288 Major Modification calculation.

8. Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

Since this source is not included in the 28 specific source categories specified in 40 CFR 51.165, the increases in fugitive emissions are not included in the Federal Major Modification determination.

9. Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The QNEC shall be calculated as follows for units S-1738-464-0 & '-465-0:

QNEC = PE2 - BE, where:

QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.
PE2 = Post Project Potential to Emit for each emissions unit, lb/qtr.
BE = Baseline Emissions (per Rule 2201) for each emissions unit, lb/qtr.

Using the values in Sections VII.C.2 and VII.C.6 in the evaluation above, quarterly PE2 and quarterly BE can be calculated as follows:

$$\begin{aligned} \text{PE2}_{\text{quarterly}} &= \text{PE2}_{\text{annual}} \div 4 \text{ quarters/year} \\ &= 110 \text{ lb/year} \div 4 \text{ qtr/year} \\ &= 28 \text{ lb VOC/qtr} \end{aligned}$$

$$\begin{aligned} BE_{\text{quarterly}} &= BE_{\text{annual}} \div 4 \text{ quarters/year} \\ &= 0 \text{ lb/year} \div 4 \text{ qtr/year} \\ &= 0 \text{ lb VOC/qtr} \end{aligned}$$

$$QNEC = 28 \text{ lb VOC/qtr}$$

VIII. Compliance

Rule 2201 *New and Modified Stationary Source Review Rule*

New and Modified Source Review (NSR) addresses requirements such as Best Available Control Technology (BACT), offsets and public notice. This project is an NSR modification under Rule 2201 § 3.26.1.4. However, District Policy APR 1130 states:

"District policy is to consider an IPE of less than 0.5 lb/day to be rounded to zero for the purposes of triggering NSR requirements and therefore the requirements are not triggered."

Therefore, Rule 2201 does not require BACT, offsets, and public notice under District Policy APR 1130.

A. Daily Emission Limits (DELs)

DELs and other enforceable conditions are required by Rule 2201 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.

DELs for the emission units in this project will be included on the ATCs in the form of fugitive component emissions limits in lb VOC/day. The permittee will be required to maintain accurate records of fugitive component counts and resulting emission calculations to validate the DEL.

Proposed Rule 2201 (DEL) Conditions:

S-1738-464 and '-465

- VOC fugitive emissions from the components in gas service on tank shall not exceed 0.3 lb/day. [District Rule 2201] N
- Permittee shall maintain accurate component count for tank according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. Permittee shall update

such records when new components are approved and installed. [District Rule 2201] N

E. Compliance Assurance

1. Source Testing

Pursuant to District Policy APR 1705, source testing is not required to demonstrate compliance with Rule 2201.

2. Monitoring

Permittee will be required to sample the gas in the vapor control system. The following condition will be placed on the ATCs to ensure compliance:

- Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 2201]
- Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 2201]
- Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 2201]
- Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 2201]
- Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking

components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rule 2201]

- If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rule 2201]
- Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rule 2201]

3. Record Keeping

Recordkeeping is required to demonstrate compliance with the offset, public notification and daily emission limit requirements of Rule 2201. The following conditions will appear on the permits:

- *The permittee shall keep accurate records of the dates of inspection and monitoring and the components inspected and monitored. [District Rule 2201]*
- {2490} All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] N

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

Rule 2520 *Federally Mandated Operating Permits*

This facility is subject to this rule, and has received their Title V Operating Permit. The proposed modification is a Minor Modification to the Title V Permit pursuant to Section 3.20 of this rule. As discussed above, the facility has applied for a Certificate of Conformity (COC); therefore, the facility must apply to modify their Title V permit with an administrative amendment/minor modification, prior to operating with the proposed modifications. Continued compliance with this rule is expected.

Rule 4001 New Source Performance Standards

This rule incorporates the New Source Performance Standards from 40 CFR Part 60. 40 CFR Part 60, Subparts, K, Ka, Kb, and OOOO and could potentially apply to the storage tanks located at this facility.

40 CFR Part 60, Subparts, K, Ka, and Kb could potentially apply to the storage tanks located at this facility. However, pursuant to 40 CFR 60.110 (b), 60.110(a) (b), and 60.110(b) (b), these subparts do not apply to storage vessels less than 10,000 bbls, used for petroleum or condensate, that is stored, processed, and/or treated at a drilling and production facility prior to custody transfer.

40 CFR Part 60, Subpart OOOO—Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution (constructed, reconstructed, or modified after 8/23/11) applies to single storage vessel, located in the oil and natural gas production segment, natural gas processing segment or natural gas transmission and storage segment.

The subject tanks are subject to this subpart and have uncontrolled VOC emissions greater than 6 tons per year. However, Vintage has provided guidance from EPA stating, “Only storage vessels with a potential to emit (PTE) of at least 6 tons per year (tpy) of VOC would be regulated under NSPS. In determining the PTE, the source can take into account emissions limits from a legally and practically enforceable state rule, operating permit or other mechanism.” Therefore, Subpart OOOO does not apply and no further discussion is required.

Rule 4101 *Visible Emissions*

Rule 4101 states that 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.

As long as the equipment is properly maintained and operated, compliance with visible emissions limits is expected under normal operating conditions.

Rule 4102 *Visible Emissions*

Rule 4102 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – *Risk Management Policy for Permitting New and Modified Sources* 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.

An HRA is not required for a project with a total facility prioritization score of less than one. According to the Technical Services Memo for this project (**Appendix VI**), the total facility prioritization score including this project was greater than one. Therefore, an

HRA was required to determine the short-term acute and long-term chronic exposure from this project.

The cancer risk for this project is shown below:

HRA Summary		
Unit	Cancer Risk	T-BACT Required
S-1738-464-0 & '- 465-0	0 per million	No

Discussion of T-BACT

BACT for toxic emission control (T-BACT) is required if the cancer risk exceeds one in one million. As demonstrated above, T-BACT is not required for this project because the HRA indicates that the risk is not above the District's thresholds for triggering T-BACT requirements; therefore, compliance with the District's Risk Management Policy is expected.

District policy APR 1905 also specifies that the increase in emissions associated with a proposed new source or modification not have acute or chronic indices, or a cancer risk greater than the District's significance levels (i.e. acute and/or chronic indices greater than 1 and a cancer risk greater than 10 in a million). As outlined by the HRA Summary in Appendix VI of this report, the emissions increases for this project were determined to be less than significant.

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

The proposed oil tanks are subject to the rule requirements as listed in the facility wide PTO S-1738-0-3. Compliance is expected.

Rule 4623 Storage of Organic Liquids

This rule applies to any tank with a capacity of 1,100 gallons or greater in which any organic liquid is placed, held, or stored.

The affected tanks are served by a vapor control system that has a control efficiency of at least 99% . This rule also requires the tank and tank vapor control system to be maintained in a leak-free condition. Leak-free is defined in the rule as no readings on a portable VOC detection device greater than 10,000 ppmv above background and no dripping of organic liquid at a rate of more than 3 drops per minute.

Compliance with the requirements of 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.

California Environmental Quality Act (CEQA)

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The District adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that all project specific emission unit(s) are exempt from Best Available Control Technology (BACT) requirements. Furthermore, the District conducted a Risk Management Review and concludes that potential health impacts are less than significant.

Issuance of permits for emissions units not subject to BACT requirements and with health impact less than significant is a matter of ensuring conformity with applicable District rules and regulations and does not require discretionary judgment or deliberation. Thus, the District concludes that this permitting action constitutes a ministerial approval. Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Issue ATCs S-1738-37-9, and '464-0 and 465 subject to the permit conditions on the attached draft ATC in **Attachment VI**.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Amount
S-1738-37-9	3020-05E	2000 BBLs	\$ 185.00
S-1738-464-0	3020-05E	1000 BBLs	\$ 135.00
S-1738-465-0	3020-05E	2000 BBLs	\$ 185.00

Attachments

- I: Current PTO
- II: Project Location Maps & Facility Plot Plans
- III: Compliance Certification Form
- IV: Gas and Oil analysis
- V: Calculations and Emissions Profiles
- VI: Health Risk Analysis
- VII: Draft ATCs

ATTACHMENT I
Current PTOs

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1738-37-7

EXPIRATION DATE: 02/28/2014

SECTION: 28 **TOWNSHIP:** 11N **RANGE:** 20W

EQUIPMENT DESCRIPTION:

84,000 GALLON FIXED ROOF PETROLEUM STORAGE TANK #2124 SERVED BY VAPOR RECOVERY SYSTEM INCLUDING 7.5 HP VAPOR COMPRESSOR (CENTRAL PLANT)

PERMIT UNIT REQUIREMENTS

1. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 99% by weight as determined by the test method specified in Section 6.4.6 of Rule 4623. [District Rules 4401 and 4623] Federally Enforceable Through Title V Permit
2. All piping valves and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623, 5.6.3] Federally Enforceable Through Title V Permit
3. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. A reading in excess of 10,000 ppmv above background or the dripping of organic liquid at a rate of more than 3 drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623, 3.11, 3.17, 3.18, and 6.4.8] Federally Enforceable Through Title V Permit
4. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623, 5.6.2] Federally Enforceable Through Title V Permit
5. The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. The operator of a fixed roof tank shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. Compliance with permit conditions in the Title V permit shall be deemed compliance with District Rule 4623 (Amended May 19, 2005). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
8. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
9. Vapors shall vent only through gas line compressor. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: VINTAGE PRODUCTION CALIFORNIA LLC

Location: LIGHT OIL WESTERN STATIONARY SOURCE, WESTERN KERN COUNTY, KERN COUNTY, CA

S-1738-37-7 : Jul 3 2013 7:45AM - DAVIDSOS

10. Storage tank p/v caps shall be set to relieve pressure at a pressure level higher than that required to actuate compressor. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Storage tank p/v caps shall be leak-free (except for inbreathing) during normal operation. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Liquids from knockout vessel shall be disposed of in a manner preventing emissions to the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit
14. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit
15. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit
16. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit
17. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit
18. If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit
19. Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit
20. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

21. The control efficiency of any VOC destruction device, measured and calculated as carbon, shall be determined by US EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case US EPA Method 25a may be used. US EPA Method 18 may be used in lieu of US EPA Method 25 or US 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 the known analytes/compounds to ensure that the VOC concentrations are neither under- or over-reported. Analysis of halogenated exempt compounds shall be analyzed by ARB Method 422 "Exempt Halogenated VOCs in Gases September 12, 1990." [District Rule 4623, 6.4.6 and 6.4.7] Federally Enforceable Through Title V Permit
22. Operator shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. Operator shall inspect pressure relief valve for fugitive leaks annually in accordance with EPA Method 21, with the instrument calibrated with methane. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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

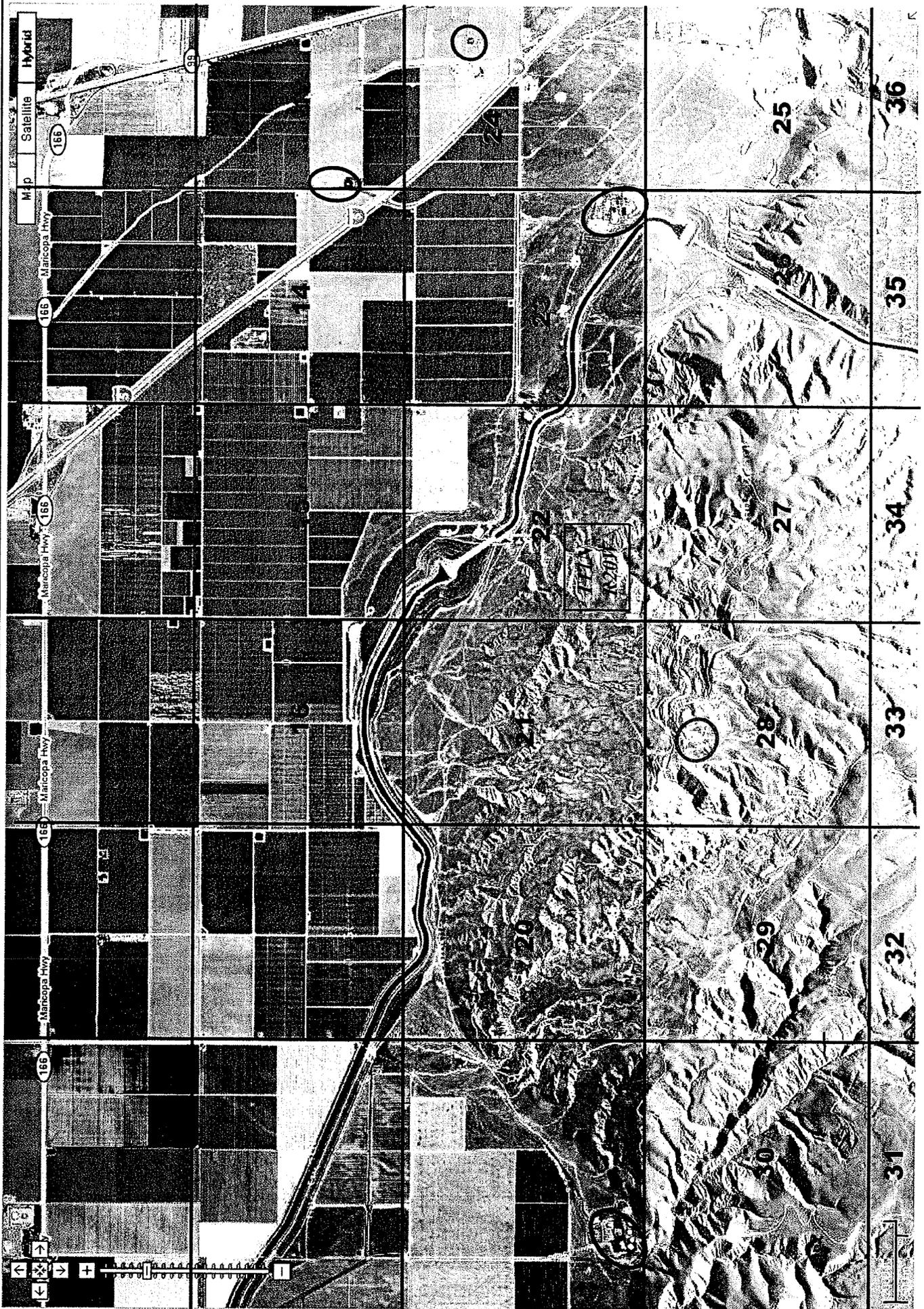
ATTACHMENT II
Project Location Maps & Facility Plot Plans

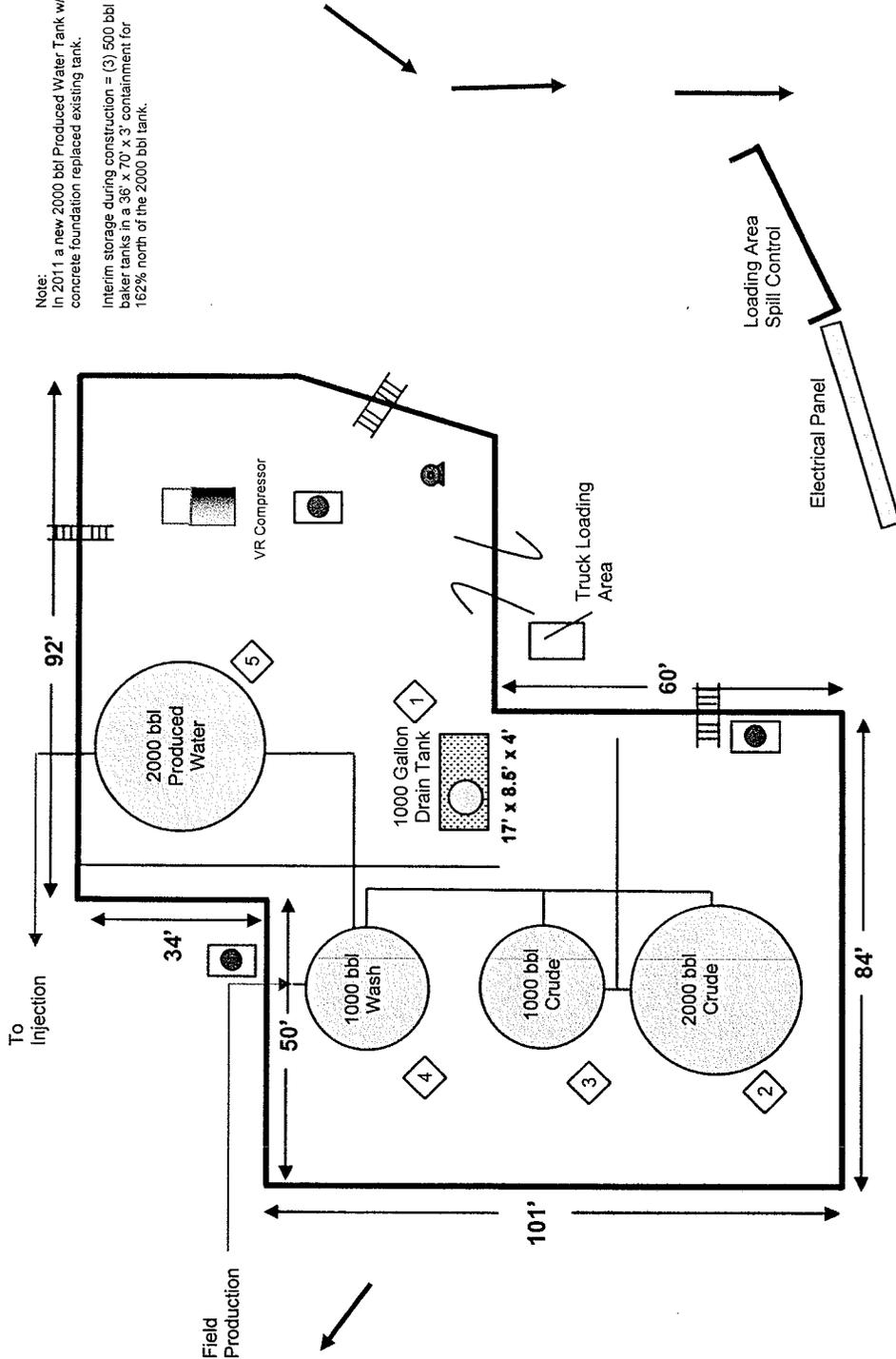
Wheeler Ridge Field – Central Tank Facility. Located in the NW quarter of section 28, Township 11N, Range 20W.
 Distance to nearest receptors: nearest business is approximately 2-miles to the NW, and the nearest residence is approximately 3 ¼ miles to the NE.

* Business Receptors ○

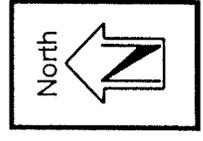
* Residential Receptors ○

* Project Site ○



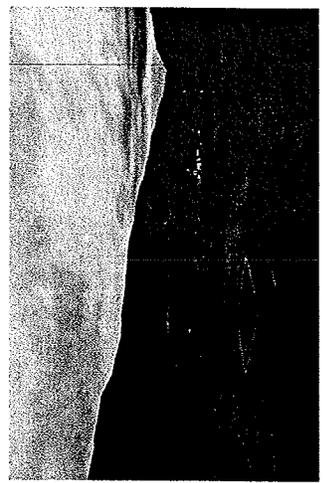


Note:
 In 2011 a new 2000 bbl Produced Water Tank w/ concrete foundation replaced existing tank.
 Interim storage during construction = (3) 500 bbl baker tanks in a 36' x 70' x 3' containment for 162% north of the 2000 bbl tank.



—	Concrete or earthen Berm
○	Horizontal Vessel
○	Vertical Vessel
○	Oil-filled Equipment
◇	Tank #
⊕	Pump
○	Air/Water Storage Exempt
005	Out of Service Exempt

Section 28 T11N R20W
 PTO#: 1738-37, 45, 201
 GPS Coordinates: (North/West)
 35° 0' 50" / -119° 1'44"
 SPCC Date: July 2011
 Vintage Production California



**WRU
 CENTRAL**

ATTACHMENT III
Compliance Certification Forms

San Joaquin Valley
Unified Air Pollution Control District

RECEIVED

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

MAR 27 2013

SJVAPCD
Southern Region

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: Vintage Production California LLC	FACILITY ID: S - 1738
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name:	
3. Agent to the Owner:	

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

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

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



Signature of Responsible Official

3-27-13

Date

Stephen Bartz

Name of Responsible Official (please print)

Operations Team Lead (Central)

Title of Responsible Official (please print)

Modification of existing TVR, S-1738-37, to add two storage tanks.

Mailing Address: Central Regional Office * 1990 E. Gettysburg Avenue * Fresno, California 93726-0244 * (559) 230-5900 * FAX (559) 230-6061

ATTACHMENT IV
Gas and Oil Analysis

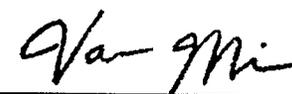


O I L F I E L D E N V I R O N M E N T A L A N D C O M P L I A N C E

Client: Vintage Production California LLC 9600 Ming Ave. Suite 300 Bakersfield, CA 93311 Attn: Joey Barulich Project: TVP/HOST Site: San Joaquin Light Oil Asset	SAMPLE ID: 1103388-7 Date Sampled: 07/14/11 @ 0918 Date Analyzed: 07/23/11 Date Received: 07/14/11 @ 1730 Lab Contact: J. Carstens
---	--

Report Of Analytical Results						
OEC ID	Client ID	Constituent	Results	Units	Method	PQL
1103388-7	WRU Central TK 201	API Gravity	27.3	API	ASTM D-4052	0.1
		RVP	3.2	psig	ASTM D-323	0.05
		TVP @ 96 °F	3.0	psia	CARB ¹	0.1

¹State of California, Air Resources Board Technical Guidance Document to the Criteria and Guidelines Regulation for AB2588. EIB/TSD August 1989 pp. 216-217.
PQL = Practical Quantitation Limit


Julius G Carstens, Lab Director

ATTACHMENT V
Calculations and
Emissions Profiles

Vintage Production CA
S1131066, Tanks S-1738-464-0 & '465-0

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 $\geq 10,000$ 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 $\geq 10,000$ ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	20	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	20	0	7.778E-03	7.281E+00	0.16
	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	40	0	6.349E-04	1.370E+00	0.03
	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	40	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 =

0.3 lb/day

Permit #: S-1738-37-9	Last Updated
Facility: VINTAGE PRODUCTION CALIFORNIA	05/30/2013 DAVIDSOS

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	0.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.0
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:					

Permit #: S-1738-464-0	Last Updated
Facility: VINTAGE PRODUCTION CALIFORNIA	06/18/2013 DAVIDSOS

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	110.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.3
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	28.0
Q2:	0.0	0.0	0.0	0.0	28.0
Q3:	0.0	0.0	0.0	0.0	28.0
Q4:	0.0	0.0	0.0	0.0	28.0
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-1738-465-0	Last Updated
Facility: VINTAGE PRODUCTION CALIFORNIA	07/03/2013 DAVIDSOS

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	110.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.3
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	28.0
Q2:	0.0	0.0	0.0	0.0	28.0
Q3:	0.0	0.0	0.0	0.0	28.0
Q4:	0.0	0.0	0.0	0.0	28.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

ATTACHMENT VI
Health Risk Analysis

REVISED
San Joaquin Valley Air Pollution Control District
Risk Management Review

To: Kris Rickards, AQE – Permit Services
 From: Joe Aguayo, AQS – Technical Services
 Date: July 1, 2013
 Facility Name: Vintage Production
 Location: S28/T11 N/R20W
 Application #(s): S-1738-464-0 and -465-0
 Project #: S-1131066

A. RMR SUMMARY

Categories	Units 464-0 and 465-0 (Two new Oil Storage Tanks)	Project Totals	Facility Totals
Prioritization Score	0.0	0.0	>1
Acute Hazard Index	0.00	0.00	0.46
Chronic Hazard Index	0.00	0.00	0.07
Maximum Individual Cancer Risk (10 ⁻⁶)	0.0	0.0	9.94
T-BACT Required?	No		
Special Permit Conditions?	No		

Proposed Permit Conditions

To ensure that human health risks will not exceed District allowable levels; the following permit conditions must be included for:

Units # 464-0 and 465-0

No special conditions required.

B. RMR REPORT

I. Project Description

Technical Services received a request on June 16, 2013, to revise a previously completed Risk Management Review for the proposed installation of two oil storage tanks. The applicant is proposing to change the daily fugitive emissions from each tank to 0.01 lb/day and 110 lb/yr. No other changes are proposed for this project.

II. Analysis

Technical Services performed a prioritization using the District's HEARTs database. Emissions were calculated using "Oilfield Equipment Fugitives Heavy Crude Oil" emission factors. In accordance with the District's *Risk Management Policy for Permitting New and Modified Sources* (APR 1905, March 2, 2001), risks from the proposed units' toxic emissions were prioritized using the procedure in the 1990 CAPCOA Facility Prioritization Guidelines and incorporated in the District's HEARTs database. The prioritization score for the facility was greater than 1.0 (see RMR Summary Table). Therefore, a refined analysis was required and performed. AERMOD was used, with the parameters outlined below and concatenated meteorological data for Bakersfield 2005 to 2009 to determine the maximum dispersion factor at the nearest residential and business receptors. These dispersion factors were input into the HARP model to calculate the chronic and acute hazard indices and the carcinogenic risk for the project.

The following parameters were used for the review:

Analysis Parameter Unit 464-0			
Closest Receptor - Business (m)	3050	Closest Receptor - Resident (m)	3050
Fugitive Oil Emissions (lbs/hr)	0.004	Fugitive Oil Emissions (lbs/yr)	110
Oil Storage Tank Height (m)	6.5	Oil Storage Diameter (m)	4.9

Analysis Parameter Unit 465-0			
Closest Receptor - Business (m)	3050	Closest Receptor - Resident (m)	3050
Fugitive Oil Emissions (lbs/hr)	0.004	Fugitive Oil Emissions (lbs/yr)	110
Oil Storage Tank Height (m)	9.1	Oil Storage Diameter (m)	4.9

III. Conclusion

The acute and chronic hazard indices were below 1.0; and the cancer risk is less than or equal to 1.0 in a million. **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.

Attachments:

- A. RMR request from the project engineer
- B. Prioritization score with toxic emissions summary
- C. HARP Risk Report

ATTACHMENT VII
Draft ATCs

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1738-37-9

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

LOCATION: LIGHT OIL WESTERN STATIONARY SOURCE
WESTERN KERN COUNTY
KERN COUNTY, CA

SECTION: 28 TOWNSHIP: 11N RANGE: 20W

EQUIPMENT DESCRIPTION:

MODIFICATION OF 2000 BBL FIXED ROOF PETROLEUM STORAGE TANK (#2124) SERVED BY VAPOR RECOVERY SYSTEM INCLUDING 7.5 HP VAPOR COMPRESSOR (CENTRAL PLANT); CONNECT TANKS S-1738-464-0 AND '465-0 TO THE VAPOR CONTROL SYSTEM

CONDITIONS

1. {1830} 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. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device the reduces the inlet VOC emissions by at least 99% by weight as determined by the test method specified in Section 6.4.6 of Rule 4623. [District Rules 4401 and 4623] Federally Enforceable Through Title V Permit
4. All piping valves and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623, 5.6.3] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director APCO

DAVID WARNER, Director of Permit Services

S-1738-37-9 : Jul 3 2013 7:45AM -- DAVIDSOS : Joint Inspection NOT Required

5. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. A reading in excess of 10,000 ppmv above background or the dripping of organic liquid at a rate of more than 3 drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623, 3.11, 3.17, 3.18, and 6.4.8] Federally Enforceable Through Title V Permit
6. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623, 5.6.2] Federally Enforceable Through Title V Permit
7. {2606} The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. {2591} The operator of a fixed roof tank shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
9. Compliance with permit conditions in the Title V permit shall be deemed compliance with District Rule 4623 (Amended May 19, 2005). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
10. {2608} This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
11. Vapors shall vent only through gas line compressor. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Storage tank p/v caps shall be set to relieve pressure at a pressure level higher than that required to actuate compressor. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Storage tank p/v caps shall be leak-free (except for inbreathing) during normal operation. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Liquids from knockout vessel shall be disposed of in a manner preventing emissions to the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit
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18. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit

DRAFT
CONDITIONS CONTINUE ON NEXT PAGE

19. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit
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21. Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit
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23. The control efficiency of any VOC destruction device, measured and calculated as carbon, shall be determined by US EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case US EPA Method 25a may be used. US EPA Method 18 may be used in lieu of US EPA Method 25 or US 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 the known analytes/compounds to ensure that the VOC concentrations are neither under- or over-reported. Analysis of halogenated exempt compounds shall be analyzed by ARB Method 422 "Exempt Halogenated VOCs in Gases September 12, 1990." [District Rule 4623, 6.4.6 and 6.4.7] Federally Enforceable Through Title V Permit
24. Operator shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
25. Operator shall inspect pressure relief valve for fugitive leaks annually in accordance with EPA Method 21, with the instrument calibrated with methane. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1738-464-0

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

LOCATION: LIGHT OIL WESTERN STATIONARY SOURCE
WESTERN KERN COUNTY
KERN COUNTY, CA

SECTION: 11N **TOWNSHIP:** 20W **RANGE:**

EQUIPMENT DESCRIPTION:

1,000 BBL FIXED ROOF CRUDE OIL STORAGE TANK SERVED BY THE VAPOR CONTROL SYSTEM LISTED ON PERMIT S-1738-37

CONDITIONS

1. {1830} 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. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in gas-tight condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 99% by weight as determined by the test method specified in Section 6.4.7. [District Rule 4623] Federally Enforceable Through Title V Permit
4. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times [District Rule 2201] Federally Enforceable Through Title V Permit

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-1738-464-0 : Jul 18 2013 12:02PM - DAVIDSOS : Joint Inspection NOT Required

5. VOC fugitive emissions from the components in gas service on tank shall not exceed 0.3 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
6. Permittee shall maintain accurate component count for tank according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. A gas or liquid leak is a violation of this permit and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. Any tank gauging or sampling device on storage tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
11. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
12. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
13. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
14. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
15. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
16. If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

17. Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
18. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
19. The permittee shall keep accurate records of the dates of inspection and monitoring and the components inspected and monitored. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
20. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1738-465-0

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

LOCATION: LIGHT OIL WESTERN STATIONARY SOURCE
WESTERN KERN COUNTY
KERN COUNTY, CA

SECTION: 28 **TOWNSHIP:** 11N **RANGE:** 20W

EQUIPMENT DESCRIPTION:

2,000 BBL FIXED ROOF CRUDE OIL STORAGE TANK SERVED BY THE VAPOR CONTROL SYSTEM LISTED ON PERMIT S-1738-37

CONDITIONS

1. {1830} 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. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in gas-tight condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 99% by weight as determined by the test method specified in Section 6.4.7. [District Rule 4623] Federally Enforceable Through Title V Permit
4. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director APCO

DAVID WARNER, Director of Permit Services
S-1738-465-0 : Jul 18 2013 12:02PM - DAVIDSOS : Joint Inspection NOT Required

5. VOC fugitive emissions from the components in gas service on tank shall not exceed 0.3 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit
6. Permittee shall maintain accurate component count for tank according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. A gas or liquid leak is a violation of this permit and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. Any tank gauging or sampling device on storage tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
11. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
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CONDITIONS CONTINUE ON NEXT PAGE

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