



APR 18 2012

William Fall
Chevron U.S.A. INC
PO Box 1392
Bakersfield, CA 93302

**Re: Notice of Minor Title V Permit Modification
District Facility # C-311
Project # C-1110004**

Dear Mr. Fall:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued C-311-83-11 into the Title V operating permit. Modification is limited to extending the vapor piping into section 25D steam generators.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued C-311-83-11, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney at (559) 230-5900.

Sincerely,

David Warner
Director of Permit Services

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

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



APR 18 2012

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

Re: **Notice of Minor Title V Permit Modification**
District Facility # C-311
Project # C-1110004

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Chevron U.S.A. INC is proposing a Title V minor permit modification to incorporate the recently issued C-311-83-11 into the Title V operating permit. Modification is limited to extending the vapor piping into section 25D steam generators.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued C-311-83-11, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney at (559) 230-5900.

Sincerely,

Martha Keast for

David Warner
Director of Permit Services

Enclosures

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TITLE V APPLICATION REVIEW

Minor Modification
Project #: C-1110004

Engineer: Don Ctibor
Date: 1-11-11

Facility Number: C-311
Facility Name: Chevron U.S.A. INC
Mailing Address: PO Box 1392
Bakersfield, CA 93302

Contact Name: William R. Fall
Phone: 661-654-7141

Responsible Official: William R. Fall
Title: HES Manager

I. PROPOSAL

Chevron USA INC is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct (ATC) C-311-83-11 into the Title V operating permit. This permit is for the modification of the Teor operation with 396 steam drive wells served by well vent vapor control system #CC-3-13D with scrubber, fin-fan air cooler and condensate collector (southwest) by extending the vapor piping to section 25D steam generators.

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

II. FACILITY LOCATION

Fresno Heavy Oil Source
Section 25 Township 20S Range 14E

III. EQUIPMENT DESCRIPTION

C-311-83-14: TEOR OPERATION WITH 396 STEAM DRIVE WELLS SERVED BY WELL VENT VAPOR CONTROL SYSTEM #CC-3-13D WITH SCRUBBER, FIN-FAN AIR COOLER AND CONDENSATE COLLECTOR (SOUTHWEST)

IV. SCOPE OF EPA AND PUBLIC REVIEW

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

V. APPLICABLE REQUIREMENTS

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

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

The well head casing vapor collection system, C-311-83, collects vapors from the well head, condenses out the entrained liquids and routes non-condensable vapors to steam generators for incineration. When the well head casing vapor collection system is operated as a vapor balance system, valves associated with the system may be closed to allow condensate and non-condensable to be displaced to the reservoir through wells served by the system. The facility will operate up to 24 hours/day and 365 days/year.

Chevron USA is proposing extend to vapor piping to section 25D steam generators. This proposal will not cause an increase in emissions.

The conditions based on District Rule 4401 (Steam-Enhanced Crude Oil Production Wells) have been updated to be compliant with the December 14, 2006 amendments.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which

the source would otherwise be subject. Such terms and conditions include;

- a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
 6. Do not seek to consolidate overlapping applicable requirements.

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

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

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. C-311-83-14
- B. Authority to Construct No. C-311-83-11
- C. Application
- D. Current Permit to Operate No. C-311-83-10

ATTACHMENT A

Proposed Modified Title V Operating Permit No.
(C-311-83-14)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-311-83-14

EXPIRATION DATE: 12/31/2005

SECTION: 13 **TOWNSHIP:** 20 **RANGE:** 14

EQUIPMENT DESCRIPTION:

TEOR OPERATION WITH 396 STEAM DRIVE WELLS SERVED BY WELL VENT VAPOR CONTROL SYSTEM #CC-3-13D WITH SCRUBBER, FIN-FAN AIR COOLER AND CONDENSATE COLLECTOR (SOUTHWEST)

PERMIT UNIT REQUIREMENTS

1. Maximum VOC content of the gas in the casing collection system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Operator shall conduct and keep records of quarterly sampling of gas handled by the 13D casing collection system to qualify for exemption from fugitive component counts for components handling fluids with less than 10% VOC by weight. Samples shall be taken from knockout vessel V1 or immediately downstream from vessel V1. If fluids sampled are less than 10% VOC by weight for eight consecutive quarterly samplings, sampling shall only be required annually. If a test shows noncompliance with the percent VOC requirement, the source must return to quarterly testing until eight consecutive quarters show compliance. Such sampling is deemed representative of the wells connected to the CC-3-13D casing collection system. [District Rule 2201] Federally Enforceable Through Title V Permit
3. {1658} During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the emission control requirements of District Rule 4401, 5.0 (as amended January 15, 1998). [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401, 6.1.1] Federally Enforceable Through Title V Permit
5. {1298} The uncontrolled VOC emissions from any well vent shall be reduced by at least 99 percent by weight or, if several steam-enhanced crude oil production well vents are connected to a vapor collection and control system, total uncontrolled VOC emissions shall be reduced by at least 99 percent. This requirement does not apply to cyclic wells located on contiguous and adjacent oil production properties with less than 10 cyclic wells owned by or under the control of a company. [District Rule 4401, 5.1 and 5.2] Federally Enforceable Through Title V Permit
6. {1304} Operator shall maintain all components of a well vent vapor collection and control system in good repair. Components of the well vent vapor collection and control system shall include all piping, valves, fittings, pumps, compressors, tanks, etc. used to collect, control, store, or dispose of VOC condensate or non-condensable VOCs and which is prior to any blending of VOC condensate with crude oil or blending of non-condensable VOCs with gases to be used as a fuel. [District Rule 4401, 5.3 and 5.3.2] Federally Enforceable Through Title V Permit
7. Total number of leaks from the vapor collection and control system, including condensate handling, shall not exceed 15 at any time. [District Rule 4401, 5.3 and 5.6] Federally Enforceable Through Title V Permit
8. {1302} Operator shall affix a readily visible tag bearing the date on which a leak is detected. The tag shall remain in place until the leaking component is repaired. [District Rule 4401, 5.3.1] Federally Enforceable Through Title V Permit
9. When a leak is detected, operator shall comply with the requirements of District Rule 4401, Section 5.9.4 through 5.9.7, within the timeframe specified for that type of leak. [District Rule 4401, 5.9.4] 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.

10. Operator shall not use any component with a leak as defined in Section 3.0 of District Rule 4401, or that is found to be in violation of the provisions of Section 5.6.2, unless such a leaking component is identified with a tag for repair, has been repaired, or is awaiting inspection after being repaired. [District Rule 4401, 5.7.1] Federally Enforceable Through Title V Permit
11. Each hatch shall be closed at all times except during sampling or addition of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are carried out as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401, 5.7.2] Federally Enforceable Through Title V Permit
12. Operator shall comply with the requirements of Section 6.7 of District Rule 4401 if there is any change in the description of major or critical components. [District Rule 4401, 5.7.3] Federally Enforceable Through Title V Permit
13. Except for pipes and unsafe-to-monitor components, operator shall inspect all components pursuant to the requirements of Section 6.3.3 of District Rule 4401 at least once every year. [District Rule 4401, 5.8.1] Federally Enforceable Through Title V Permit
14. Operator shall visually inspect all pipes at least once every year. [District Rule 4401, 5.8.2] Federally Enforceable Through Title V Permit
15. Operator shall audio-visually (by hearing and by sight) inspect for leaks all accessible operating pumps, compressors, and pressure relief devices in service at least once each calendar week. [District Rule 4401, 5.8.3.1] Federally Enforceable Through Title V Permit
16. Any visual or audio-visual inspection of pipes, pumps, compressors, or pressure relief devices that indicates a leak that cannot be immediately repaired to meet the leak standards of District Rule 4401, Section 5.6, shall be inspected within 24 hours after detecting the leak. If a leak is found during this follow-up inspection, the leak shall be repaired as soon as practicable, but not later than the time frame specified in Table 4 of District Rule 4401. [District Rule 4401, 5.8.2 and 5.8.3.2] Federally Enforceable Through Title V Permit
17. A pressure relief device that releases VOC to the atmosphere shall be initially inspected as soon as possible but not later than 24 hours after discovery of the release. The pressure relief device shall be inspected again not earlier than 24 hours and not later than 15 days after the initial inspection. [District Rule 4401, 5.8.4.1] Federally Enforceable Through Title V Permit
18. Operator shall inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. [District Rule 4401, 5.8.4.2] Federally Enforceable Through Title V Permit
19. Operator shall inspect all repaired or replaced components, except for pressure relief devices, within 15 days after the repair or replacement. [District Rule 4401, 5.8.4.3] Federally Enforceable Through Title V Permit
20. Operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401, 5.8.5] Federally Enforceable Through Title V Permit
21. Operator shall maintain an inspection log which includes the following information: 1) the total number of components inspected and the total number and percentage of leaking components found by component type, 2) the location, type, and name or description of each leaking component and description of any unit where the leaking component is found, 3) the date and method of leak detection, 4) the size of the leak (in ppmv for gaseous leaks, and major or minor for liquid leaks), 5) the date the leaking component is repaired, replaced, or removed from service, 6) the identity and location of essential or critical components found leaking that cannot be repaired until the next regular process unit turnaround or not later than one year after leak detection, whichever comes later, 7) the methods used to minimize the leak from essential or critical components, 8) the date of reinspection and the leak concentration (in ppmv) after the component is repaired or replaced, 9) the inspector's name, mailing address, and business telephone number, and 10) the date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401, 6.1.5 and 6.4] 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.

22. Operator shall maintain records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including: 1) a copy of the current calibration gas certification from the vendor, 2) the date of calibration, 3) concentration of calibration gas, 4) instrument reading of calibration gas before adjustment, 5) instrument reading of calibration gas after adjustment, 6) calibration gas expiration date, and 7) calibration gas cylinder pressure at the time of calibration. [District Rule 4401, 6.1.6] Federally Enforceable Through Title V Permit
23. Operator shall implement and maintain a program to train employees to inspect and repair components and properly maintain records of those inspection and repair activities. Operator shall maintain copies of the training program records. [District Rule 4401, 6.1.7 and 6.5] Federally Enforceable Through Title V Permit
24. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401, 6.1.8] Federally Enforceable Through Title V Permit
25. {1665} VOC content shall be determined using the latest revision of ASTM Method E168, E169, or E260 as applicable. Halogenated exempt compounds shall be determined by CARB Method 432. [District Rule 4401, 6.3.2] Federally Enforceable Through Title V Permit
26. The operator shall inspect at least 20% of the wells each calendar year, using a portable hydrocarbon detection instrument in accordance with US EPA Method 21. [District Rules 2520; 9.3.2 and 4401, 6.3.3] Federally Enforceable Through Title V Permit
27. Collected vapors shall be incinerated in steam generators approved by the District for TEOR gas incineration. [District Rules 2201 and 4401] Federally Enforceable Through Title V Permit
28. Operator shall maintain a current roster of all wells connected to this system. [District Rules 1070 and 4401] Federally Enforceable Through Title V Permit
29. {1311} The requirements of SJVUAPCD Rule 4407 (Adopted May 19, 1994) do not apply to this permit unit. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
30. Operation of the fin-fan air cooler is optional. [District Rule 2201] Federally Enforceable Through Title V Permit
31. All records of required monitoring data and support information shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rules 2520, 9.4.2 and 4401, 6.1] Federally Enforceable Through Title V Permit

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

DRAFT

ATTACHMENT B

Authorities to Construct No.
(C-311-83-11)



AUTHORITY TO CONSTRUCT

PERMIT NO: C-311-83-11

ISSUANCE DATE: 09/22/2009

LEGAL OWNER OR OPERATOR: CHEVRON USA INC
MAILING ADDRESS: PO BOX 1392
BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL PRODUCTION
FRESNO COUNTY, CA

SECTION: 13 **TOWNSHIP:** 20 **RANGE:** 14

EQUIPMENT DESCRIPTION:

MODIFICATION OF TEOR OPERATION WITH 396 STEAM DRIVE WELLS SERVED BY WELL VENT VAPOR CONTROL SYSTEM #CC-3-13D WITH SCRUBBER, FIN-FAN AIR COOLER AND CONDENSATE COLLECTOR (SOUTHWEST):
EXTEND VAPOR PIPING TO SECTION 25D STEAM GENERATORS

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Maximum VOC content of the gas in the casing collection system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Operator shall conduct and keep records of quarterly sampling of gas handled by the 13D casing collection system to qualify for exemption from fugitive component counts for components handling fluids with less than 10% VOC by weight. Samples shall be taken from knockout vessel V1 or immediately downstream from vessel V1. If fluids sampled are less than 10% VOC by weight for eight consecutive quarterly samplings, sampling shall only be required annually. If a test shows noncompliance with the percent VOC requirement, the source must return to quarterly testing until eight consecutive quarters show compliance. Such sampling is deemed representative of the wells connected to the CC-3-13D casing collection system. [District Rule 2201] Federally Enforceable Through Title V Permit
4. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the emission control requirements of District Rule 4401, 5.0 (as amended January 15, 1998). [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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 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

C-311-83-11: 8 Sep 22 2009 8:13AM - RICKARDK : Joint Inspection NOT Required

5. Operator shall maintain records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401, 6.1.1] Federally Enforceable Through Title V Permit
6. The uncontrolled VOC emissions from any well vent shall be reduced by at least 99 percent by weight or, if several steam-enhanced crude oil production well vents are connected to a vapor collection and control system, total uncontrolled VOC emissions shall be reduced by at least 99 percent. This requirement does not apply to cyclic wells located on contiguous and adjacent oil production properties with less than 10 cyclic wells owned by or under the control of a company. [District Rule 4401, 5.1 and 5.2] Federally Enforceable Through Title V Permit
7. Operator shall maintain all components of a well vent vapor collection and control system in good repair. Components of the well vent vapor collection and control system shall include all piping, valves, fittings, pumps, compressors, tanks, etc. used to collect, control, store, or dispose of VOC condensate or non-condensable VOCs and which is prior to any blending of VOC condensate with crude oil or blending of non-condensable VOCs with gases to be used as a fuel. [District Rule 4401, 5.3 and 5.3.2] Federally Enforceable Through Title V Permit
8. Total number of leaks from the vapor collection and control system, including condensate handling, shall not exceed 15 at any time. [District Rule 4401, 5.3 and 5.6] Federally Enforceable Through Title V Permit
9. Operator shall affix a readily visible tag bearing the date on which a leak is detected. The tag shall remain in place until the leaking component is repaired. [District Rule 4401, 5.3.1] Federally Enforceable Through Title V Permit
10. When a leak is detected, operator shall comply with the requirements of District Rule 4401, Section 5.9.4 through 5.9.7, within the timeframe specified for that type of leak. [District Rule 4401, 5.9.4] Federally Enforceable Through Title V Permit
11. Operator shall not use any component with a leak as defined in Section 3.0 of District Rule 4401, or that is found to be in violation of the provisions of Section 5.6.2, unless such a leaking component is identified with a tag for repair, has been repaired, or is awaiting inspection after being repaired. [District Rule 4401, 5.7.1] Federally Enforceable Through Title V Permit
12. Each hatch shall be closed at all times except during sampling or addition of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are carried out as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401, 5.7.2] Federally Enforceable Through Title V Permit
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17. Any visual or audio-visual inspection of pipes, pumps, compressors, or pressure relief devices that indicates a leak that cannot be immediately repaired to meet the leak standards of District Rule 4401, Section 5.6, shall be inspected within 24 hours after detecting the leak. If a leak is found during this follow-up inspection, the leak shall be repaired as soon as practicable, but not later than the time frame specified in Table 4 of District Rule 4401. [District Rule 4401, 5.8.2 and 5.8.3.2] Federally Enforceable Through Title V Permit
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19. Operator shall inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. [District Rule 4401, 5.8.4.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. Operator shall inspect all repaired or replaced components, except for pressure relief devices, within 15 days after the repair or replacement. [District Rule 4401, 5.8.4.3] Federally Enforceable Through Title V Permit
21. Operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401, 5.8.5] Federally Enforceable Through Title V Permit
22. Operator shall maintain an inspection log which includes the following information: 1) the total number of components inspected and the total number and percentage of leaking components found by component type, 2) the location, type, and name or description of each leaking component and description of any unit where the leaking component is found, 3) the date and method of leak detection, 4) the size of the leak (in ppmv for gaseous leaks, and major or minor for liquid leaks), 5) the date the leaking component is repaired, replaced, or removed from service, 6) the identity and location of essential or critical components found leaking that cannot be repaired until the next regular process unit turnaround or not later than one year after leak detection, whichever comes later, 7) the methods used to minimize the leak from essential or critical components, 8) the date of reinspection and the leak concentration (in ppmv) after the component is repaired or replaced, 9) the inspector's name, mailing address, and business telephone number, and 10) the date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401, 6.1.5 and 6.4] Federally Enforceable Through Title V Permit
23. Operator shall maintain records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including: 1) a copy of the current calibration gas certification from the vendor, 2) the date of calibration, 3) concentration of calibration gas, 4) instrument reading of calibration gas before adjustment, 5) instrument reading of calibration gas after adjustment, 6) calibration gas expiration date, and 7) calibration gas cylinder pressure at the time of calibration. [District Rule 4401, 6.1.6] Federally Enforceable Through Title V Permit
24. Operator shall implement and maintain a program to train employees to inspect and repair components and properly maintain records of those inspection and repair activities. Operator shall maintain copies of the training program records. [District Rule 4401, 6.1.7 and 6.5] Federally Enforceable Through Title V Permit
25. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401, 6.1.8] Federally Enforceable Through Title V Permit
26. VOC content shall be determined using the latest revision of ASTM Method E168, E169, or E260 as applicable. Halogenated exempt compounds shall be determined by CARB Method 432. [District Rule 4401, 6.3.2] Federally Enforceable Through Title V Permit
27. The operator shall inspect at least 20% of the wells each calendar year, using a portable hydrocarbon detection instrument in accordance with US EPA Method 21. [District Rules 2520, 9.3.2 and 4401, 6.3.3] Federally Enforceable Through Title V Permit
28. Collected vapors shall be incinerated in steam generators approved by the District for TEOR gas incineration. [District Rules 2201 and 4401] Federally Enforceable Through Title V Permit
29. Operator shall maintain a current roster of all wells connected to this system. [District Rules 1070 and 4401] Federally Enforceable Through Title V Permit
30. The requirements of SJVUAPCD Rule 4407 (Adopted May 19, 1994) do not apply to this permit unit. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
31. Operation of the fin-fan air cooler is optional. [District Rule 2201] Federally Enforceable Through Title V Permit
32. All records of required monitoring data and support information shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rules 2520, 9.4.2 and 4401, 6.1] Federally Enforceable Through Title V Permit

ATTACHMENT C

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

RECEIVED

JAN 04 2011

Permits Srvc
SJVAPCD

Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: CHEVRON U.S.A. INC.	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>PO BOX 1392</u> CITY: <u>BAKERSFIELD</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93302</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>Fresno Heavy Oil Source</u> CITY: _____ _____ 1/4 SECTION <u>25</u> TOWNSHIP <u>20S</u> RANGE <u>14E</u>	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: CRUDE OIL AND GAS PRODUCTION	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Implementation of ATC C-311-83-11 Extend Vapor Piping To Section 25D Steam Generators	
6. TYPE OR PRINT NAME OF APPLICANT: William R. Fall	TITLE OF APPLICANT: HES Manager
7. SIGNATURE OF APPLICANT: <i>William R. Fall</i>	DATE: <u>1/3/2010</u> PHONE: (661) 654-7141 FAX: (661) 654-7606 EMAIL: landilr@chevron.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ <u>0</u> CHECK#: <u>0</u>
	DATE PAID: <u>0</u>
	PROJECT NO: <u>C-1110004</u> FACILITY ID: <u>C-311</u>



RECEIVED

JAN 04 2011

Permits Srvc
SJVAPCD

William R. Fall
Health, Environment and
Safety Manager

San Joaquin Valley SBU
Chevron North America
Exploration and Production
P. O. Box 1392
Bakersfield, CA 93302
Tel 661 654 7038
Fax 661 654 7004

January 3, 2011

Mr. James Swaney, Manager
Permit Services
San Joaquin Valley Air Pollution Control District
1990 East Gettysburg Avenue
Fresno, CA 93726

RE: Title V Minor Modification—ATC C-311-83-11

Dear Mr. Swaney:

Chevron's application for minor modification of Title V permits is attached for your review and approval. The subject ATC was approved under Project C-1003036. A copy is attached for your reference. This application may be included with the application for ATC C-311-83-12 submitted December 9, 2010.

Our Compliance Certification is also attached. Please bill us for the review fees, as allowed.

Thank you for your assistance. Please telephone Larry Landis at (661) 654-7141, or Lance Ericksen, our HES Business Partner, at phone number (661) 654-7145 if there are questions.

Sincerely,

William R. Fall,
Health, Environment and Safety Manager

LRL
Attachments

**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: CHEVRON U.S.A. INC.	FACILITY ID: C-311
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: CHEVRON U.S.A. INC.	
3. Agent to the Owner: N/A	

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

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

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

William Fall
Signature of Responsible Official

1/3/2011
Date

William Fall
Name of Responsible Official (please print)

ATC C-311-83-11

SJVBU HES Manager
Title of Responsible Official (please print)

ATTACHMENT D

Current Permit to Operate
(C-311-83-10)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-311-83-10

EXPIRATION DATE: 12/31/2005

SECTION: 13 **TOWNSHIP:** 20 **RANGE:** 14

EQUIPMENT DESCRIPTION:

TEOR OPERATION WITH 396 STEAM DRIVE WELLS SERVED BY WELL VENT VAPOR CONTROL SYSTEM #CC-3-13D WITH SCRUBBER, FIN-FAN AIR COOLER AND CONDENSATE COLLECTOR (SOUTHWEST)

PERMIT UNIT REQUIREMENTS

1. Maximum VOC content of the gas in the casing collection system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Operator shall conduct and keep records of quarterly sampling of gas handled by the 13D casing collection system to qualify for exemption from fugitive component counts for components handling fluids with less than 10% VOC by weight. Samples shall be taken from knockout vessel V1 or immediately downstream from vessel V1. If fluids sampled are less than 10% VOC by weight for eight consecutive quarterly samplings, sampling shall only be required annually. If a test shows noncompliance with the percent VOC requirement, the source must return to quarterly testing until eight consecutive quarters show compliance. Such sampling is deemed representative of the wells connected to the CC-3-13D casing collection system. [District Rule 2201] Federally Enforceable Through Title V Permit
3. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the emission control requirements of District Rule 4401, 5.0 (as amended January 15, 1998). [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401, 6.1.1] Federally Enforceable Through Title V Permit
5. The uncontrolled VOC emissions from any well vent shall be reduced by at least 99 percent by weight or, if several steam-enhanced crude oil production well vents are connected to a vapor collection and control system, total uncontrolled VOC emissions shall be reduced by at least 99 percent. This requirement does not apply to cyclic wells located on contiguous and adjacent oil production properties with less than 10 cyclic wells owned by or under the control of a company. [District Rule 4401, 5.1 and 5.2] Federally Enforceable Through Title V Permit
6. Operator shall maintain all components of a well vent vapor collection and control system in good repair. Components of the well vent vapor collection and control system shall include all piping, valves, fittings, pumps, compressors, tanks, etc. used to collect, control, store, or dispose of VOC condensate or non-condensable VOCs and which is prior to any blending of VOC condensate with crude oil or blending of non-condensable VOCs with gases to be used as a fuel. [District Rule 4401, 5.3 and 5.3.2] Federally Enforceable Through Title V Permit
7. Total number of leaks from the vapor collection and control system, including condensate handling, shall not exceed 15 at any time. [District Rule 4401, 5.3 and 5.6] Federally Enforceable Through Title V Permit
8. Operator shall affix a readily visible tag bearing the date on which a leak is detected. The tag shall remain in place until the leaking component is repaired. [District Rule 4401, 5.3.1] Federally Enforceable Through Title V Permit
9. When a leak is detected, operator shall comply with the requirements of District Rule 4401, Section 5.9.4 through 5.9.7, within the timeframe specified for that type of leak. [District Rule 4401, 5.9.4] 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.

10. Operator shall not use any component with a leak as defined in Section 3.0 of District Rule 4401, or that is found to be in violation of the provisions of Section 5.6.2, unless such a leaking component is identified with a tag for repair, has been repaired, or is awaiting inspection after being repaired. [District Rule 4401, 5.7.1] Federally Enforceable Through Title V Permit
11. Each hatch shall be closed at all times except during sampling or addition of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are carried out as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401, 5.7.2] Federally Enforceable Through Title V Permit
12. Operator shall comply with the requirements of Section 6.7 of District Rule 4401 if there is any change in the description of major or critical components. [District Rule 4401, 5.7.3] Federally Enforceable Through Title V Permit
13. Except for pipes and unsafe-to-monitor components, operator shall inspect all components pursuant to the requirements of Section 6.3.3 of District Rule 4401 at least once every year. [District Rule 4401, 5.8.1] Federally Enforceable Through Title V Permit
14. Operator shall visually inspect all pipes at least once every year. [District Rule 4401, 5.8.2] Federally Enforceable Through Title V Permit
15. Operator shall audio-visually (by hearing and by sight) inspect for leaks all accessible operating pumps, compressors, and pressure relief devices in service at least once each calendar week. [District Rule 4401, 5.8.3.1] Federally Enforceable Through Title V Permit
16. Any visual or audio-visual inspection of pipes, pumps, compressors, or pressure relief devices that indicates a leak that cannot be immediately repaired to meet the leak standards of District Rule 4401, Section 5.6, shall be inspected within 24 hours after detecting the leak. If a leak is found during this follow-up inspection, the leak shall be repaired as soon as practicable, but not later than the time frame specified in Table 4 of District Rule 4401. [District Rule 4401, 5.8.2 and 5.8.3.2] Federally Enforceable Through Title V Permit
17. A pressure relief device that releases VOC to the atmosphere shall be initially inspected as soon as possible but not later than 24 hours after discovery of the release. The pressure relief device shall be inspected again not earlier than 24 hours and not later than 15 days after the initial inspection. [District Rule 4401, 5.8.4.1] Federally Enforceable Through Title V Permit
18. Operator shall inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. [District Rule 4401, 5.8.4.2] Federally Enforceable Through Title V Permit
19. Operator shall inspect all repaired or replaced components, except for pressure relief devices, within 15 days after the repair or replacement. [District Rule 4401, 5.8.4.3] Federally Enforceable Through Title V Permit
20. Operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401, 5.8.5] Federally Enforceable Through Title V Permit
21. Operator shall maintain an inspection log which includes the following information: 1) the total number of components inspected and the total number and percentage of leaking components found by component type, 2) the location, type, and name or description of each leaking component and description of any unit where the leaking component is found, 3) the date and method of leak detection, 4) the size of the leak (in ppmv for gaseous leaks, and major or minor for liquid leaks), 5) the date the leaking component is repaired, replaced, or removed from service, 6) the identity and location of essential or critical components found leaking that cannot be repaired until the next regular process unit turnaround or not later than one year after leak detection, whichever comes later, 7) the methods used to minimize the leak from essential or critical components, 8) the date of reinspection and the leak concentration (in ppmv) after the component is repaired or replaced, 9) the inspector's name, mailing address, and business telephone number, and 10) the date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401, 6.1.5 and 6.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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22. Operator shall maintain records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including: 1) a copy of the current calibration gas certification from the vendor, 2) the date of calibration, 3) concentration of calibration gas, 4) instrument reading of calibration gas before adjustment, 5) instrument reading of calibration gas after adjustment, 6) calibration gas expiration date, and 7) calibration gas cylinder pressure at the time of calibration. [District Rule 4401, 6.1.6] Federally Enforceable Through Title V Permit
23. Operator shall implement and maintain a program to train employees to inspect and repair components and properly maintain records of those inspection and repair activities. Operator shall maintain copies of the training program records. [District Rule 4401, 6.1.7 and 6.5] Federally Enforceable Through Title V Permit
24. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401, 6.1.8] Federally Enforceable Through Title V Permit
25. VOC content shall be determined using the latest revision of ASTM Method E168, E169, or E260 as applicable. Halogenated exempt compounds shall be determined by CARB Method 432. [District Rule 4401, 6.3.2] Federally Enforceable Through Title V Permit
26. The operator shall inspect at least 20% of the wells each calendar year, using a portable hydrocarbon detection instrument in accordance with US EPA Method 21. [District Rules 2520, 9.3.2 and 4401, 6.3.3] Federally Enforceable Through Title V Permit
27. Collected vapors shall be incinerated in steam generators approved by the District for TEOR gas incineration. [District NSR Rule and District Rule 4401] Federally Enforceable Through Title V Permit
28. Operator shall maintain a current roster of all wells connected to this system. [District Rules 1070 and 4401] Federally Enforceable Through Title V Permit
29. The requirements of SJVUAPCD Rule 4407 (Adopted May 19, 1994) do not apply to this permit unit. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
30. Operation of the fin-fan air cooler is optional. [District NSR Rule] Federally Enforceable Through Title V Permit
31. All records of required monitoring data and support information shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rules 2520, 9.4.2 and 4401, 6.1] Federally Enforceable Through Title V Permit

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