



**MAR 18 2013**

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 # S-8282**  
**Project # S-1122417**

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Occidental of Elk Hills is proposing a Title V minor permit modification to incorporate the recently issued Authorities to Construct S-8282-87-0 & '-88-0 (formerly permitted under the same owner as Occidental of Elk Hills, Inc. S-1216-168-0 & '-169-0) into the Title V operating permit. The two ATCs authorize new produced water storage tanks.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authorities to Construct S-8282-87-0 & '-88-0 (formerly permitted under the same owner as Occidental of Elk Hills, Inc. S-1216-168-0 & '-169-0), emission increases and application. 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. Leonard Scandura at (661) 392-5500.

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



**MAR 18 2013**

Raymond Rodriguez  
Occidental of Elk Hills  
10800 Stockdale Hwy  
Bakersfield, CA 93311

**Re: Notice of Minor Title V Permit Modification  
District Facility # S-8282  
Project # S-1122417**

Dear Mr. Rodriguez:

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 Authorities to Construct S-8282-87-0 & '-88-0 (formerly permitted under the same owner as Occidental of Elk Hills, Inc. S-1216-168-0 & '-169-0) into the Title V operating permit. The two ATCs authorize new produced water storage tanks.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authorities to Construct S-8282-87-0 & '-88-0 (formerly permitted under the same owner as Occidental of Elk Hills, Inc. S-1216-168-0 & '-169-0), emission increases and application. 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. Leonard Scandura at (661) 392-5500.

Sincerely,

David Warner  
Director of Permit Services

Enclosures

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Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585

# TITLE V APPLICATION REVIEW

Minor Modification  
Project #: S-1122417

Engineer: Robert Rinaldi  
Date: March 1, 2013

Facility Number: S-8282  
Facility Name: Vintage Production California  
Mailing Address: 10800 Stockdale Hwy  
Bakersfield, CA 93311

*Reviewed by AP SURE ADE*

MAR 12 2013

Contact Name: Raymond Rodriguez  
Phone: (661) 412-5263

Responsible Official: Armando Gonzalez  
Title: HES Manager

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## I. PROPOSAL

Occidental of Elk Hills is proposing a Title V minor permit modification to incorporate the recently issued ATCs S-8282-87-0 & '-88-0 (formerly permitted under the same owner as Occidental of Elk Hills, Inc. S-1216-168-0 & '-169-0) into the Title V operating permit for two new crude oil storage tanks.

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

Facilities S-8282 (Vintage Production California) and S-382 and S-1216 (Occidental of Elk Hills) comprise the western light oil stationary source in Kern County, CA.

### **III. EQUIPMENT DESCRIPTION**

#### **S-8282-87-1:**

500 BBL FIXED ROOF PRODUCED WATER TANK (6D ASZU DEHY POOL)  
VENTED TO A VAPOR CONTROL SYSTEM WITH GAS/LIQUID SEPARATOR  
VESSEL(S) VENTED TO FIELD GAS GATHERING SYSTEM

#### **S-8282-88-1:**

500 BBL FIXED ROOF PRODUCED WATER TANK (9D ASZU DEHY POOL)  
VENTED TO A VAPOR CONTROL SYSTEM WITH GAS/LIQUID SEPARATOR  
VESSEL(S) VENTED TO FIELD GAS GATHERING SYSTEM

### **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**

ATCs S-8282-87-0 and S-8282-88-0 are new permit units; with no existing Title V PTO being modified. There are no changes to previously approved permit conditions.

### **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 Title V Operating Permits
- B. Authorities to Construct
- C. Emissions Increases
- D. Application
- E. Compliance Certification Form

# ATTACHMENT A

Proposed Modified Title V Operating Permit No.  
(S-8282-87-1 & '-88-1)

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-8282-87-1

EXPIRATION DATE: 02/28/2014

SECTION: NE06 TOWNSHIP: 32S RANGE: 24E

## EQUIPMENT DESCRIPTION:

500 BBL FIXED ROOF PRODUCED WATER TANK (6D ASZU DEHY POOL) VENTED TO A VAPOR CONTROL SYSTEM WITH GAS/LIQUID SEPARATOR VESSEL(S) VENTED TO FIELD GAS GATHERING SYSTEM

## PERMIT UNIT REQUIREMENTS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
3. The tank shall be equipped with a vapor loss prevention system capable of collecting all VOC emissions and preventing their emissions to the atmosphere at an efficiency of at least 95% by weight. [District Rules 2201 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] Federally Enforceable Through Title V Permit
5. VOC fugitive emissions from the components in gas and light oil service shall not exceed 0.4 lb/day nor 146 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Fugitive VOC emissions rate shall be, calculated using CAPCOA 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 (Feb 1999), from the total number of components from this tank. [District Rule 2201] Federally Enforceable Through Title V Permit
7. 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. [District Rule 4623] Federally Enforceable Through Title V Permit
8. 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] Federally Enforceable Through Title V Permit
9. Permittee shall maintain records of number and type of components installed and calculated fugitive emissions. Permittee shall update such records when new components are installed. [District Rule 2201] Federally Enforceable Through Title V Permit
10. All records shall be maintained and retained on the premises for a period of at least five years and made available for District Inspection upon request. [District Rule 1070]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-8282-88-1

**EXPIRATION DATE:** 02/28/2014

**SECTION:** 09 **TOWNSHIP:** 32S **RANGE:** 24E

**EQUIPMENT DESCRIPTION:**

500 BBL FIXED ROOF PRODUCED WATER TANK (9D ASZU DEHY POOL) VENTED TO A VAPOR CONTROL SYSTEM WITH GAS/LIQUID SEPARATOR VESSEL(S) VENTED TO FIELD GAS GATHERING SYSTEM

## PERMIT UNIT REQUIREMENTS

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1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
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10. All records shall be maintained and retained on the premises for a period of at least five years and made available for District Inspection upon request. [District Rule 1070]

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

# ATTACHMENT B

Authorities to Construct No.  
(S-8282-87-0 & '-88-0)

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** S-8282-87-0

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

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

**SECTION:** NE06 **TOWNSHIP:** 32S **RANGE:** 24E

**EQUIPMENT DESCRIPTION:**

500 BBL FIXED ROOF PRODUCED WATER TANK (6D ASZU DEHY POOL) VENTED TO A VAPOR CONTROL SYSTEM WITH GAS/LIQUID SEPARATOR VESSEL(S) VENTED TO FIELD GAS GATHERING SYSTEM (REISSUE OF ATC S-1216-168-0)

**CONDITIONS**

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
3. The tank shall be equipped with a vapor loss prevention system capable of collecting all VOC emissions and preventing their emissions to the atmosphere at an efficiency of at least 95% by weight. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
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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-8282-87-0 : Mar 12 2013 11:39AM - RINALDIR : Joint Inspection NOT Required

7. 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. [District Rule 4623] Federally Enforceable Through Title V Permit
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10. All records shall be maintained and retained on the premises for a period of at least five years and made available for District Inspection upon request. [District Rule 1070]

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE:** DRAFT  
**DRAFT**

**PERMIT NO:** S-8282-88-0

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

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

**SECTION:** 09 **TOWNSHIP:** 32S **RANGE:** 24E

**EQUIPMENT DESCRIPTION:**

500 BBL FIXED ROOF PRODUCED WATER TANK (9D ASZU DEHY POOL) VENTED TO A VAPOR CONTROL SYSTEM WITH GAS/LIQUID SEPARATOR VESSEL(S) VENTED TO FIELD GAS GATHERING SYSTEM (REISSUE OF S-1216-169-0)

**CONDITIONS**

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CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director APCO

**DRAFT**

DAVID WARNER, Director of Permit Services

S-8282-88-0 : Mar 12 2013 11:38AM -- RINALDIR : Joint Inspection NOT Required

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10. All records shall be maintained and retained on the premises for a period of at least five years and made available for District Inspection upon request. [District Rule 1070]

DRAFT



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-1216-168-0

**ISSUANCE DATE:** 09/01/2011

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

**LOCATION:** LIGHT OIL WESTERN

**EQUIPMENT DESCRIPTION:**  
500 BBL FIXED ROOF PRODUCED WATER TANK (6D ASZU DEHY POOL) VENTED TO A VAPOR CONTROL SYSTEM WITH GAS/LIQUID SEPARATOR VESSEL(S) VENTED TO FIELD GAS GATHERING SYSTEM (REVISED 9/7/11)

### CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
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CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

8. 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]
9. Permittee shall maintain records of number and type of components installed and calculated fugitive emissions. Permittee shall update such records when new components are installed. [District Rule 2201]
10. All records shall be maintained and retained on the premises for a period of at least five years and made available for District Inspection upon request. [District Rule 1070]



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-1216-169-0

**ISSUANCE DATE:** 09/01/2011

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

**LOCATION:** LIGHT OIL WESTERN

**EQUIPMENT DESCRIPTION:**

500 BBL FIXED ROOF PRODUCED WATER TANK (9D ASZU DEHY POOL) VENTED TO A VAPOR CONTROL SYSTEM WITH GAS/LIQUID SEPARATOR VESSEL(S) VENTED TO FIELD GAS GATHERING SYSTEM (REVISED 9/7/11)

### CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
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CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

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# ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
S-1216-168-1	0	146	0	0	0
S-1216-169-1	0	146	0	0	0
<b>TOTAL</b>	<b>0</b>	<b>292</b>	<b>0</b>	<b>0</b>	<b>0</b>

# ATTACHMENT D

Application

# San Joaquin Valley Air Pollution Control District

[www.valleyair.org](http://www.valleyair.org)

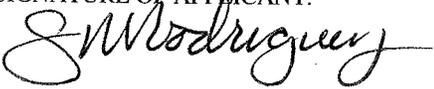
S-1216-168-1 & 169-1  
S-8282-874 & 88-1  
RECEIVED

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SJVAPCD  
Southern Region

## Permit Application For:

ADMINISTRATIVE AMENDMENT     MINOR MODIFICATION     SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">Occidental of Elk Hills, Inc</p>	
2. MAILING ADDRESS:  STREET/P.O. BOX: <u>10800 Stockdale Hwy</u>  CITY: <u>Bakersfield</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93311</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:  STREET: <u>Elk Hills</u> CITY: <u>Tupman</u>  ¼ SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: Oil and Natural Gas Production	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)  Incorporate the following ATCs into S-1216 Title V Permit:  S-1216-168-0    S-1216-169-0	
6. TYPE OR PRINT NAME OF APPLICANT: <p style="text-align: center;">Raymond Rodriguez</p>	TITLE OF APPLICANT: <p style="text-align: center;">Sr. Environmental Advisor</p>
7. SIGNATURE OF APPLICANT: 	DATE: <u>June 22, 2012</u>  PHONE: (661) 412-5263 FAX: (661) 412-5270 EMAIL: <u>Raymond_rodriguez@oxy.com</u>

**For APCD Use Only:**

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: <u>S-1122417</u> FACILITY ID: <u>S-1216</u>

*Title V - Minor Mod*

# ATTACHMENT E

Compliance Certification Form

San Joaquin Valley  
Unified Air Pollution Control District

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TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION                       ADMINISTRATIVE AMENDMENT  
 MINOR PERMIT MODIFICATION

COMPANY NAME: Occidental of Elk Hills, Inc	FACILITY ID: S - 1216
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: Occidental of Elk Hills, Inc	
3. Agent to the Owner: Occidental of Elk Hills, Inc.	

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:

  
Signature of Responsible Official

June 22, 2012

Date

Armando Gonzalez

Name of Responsible Official (please print)

Health, Environmental, Safety & Security Manager

Title of Responsible Official (please print)