



**JUL 30 2013**

Mr. Jason Donchin  
Chevron U.S.A., Inc.  
P.O. Box 1392  
Bakersfield, CA 93302

**Re: Notice of Minor Title V Permit Modification**  
**District Facility # S-1128**  
**Project # S-1123060**

Dear Mr. Donchin:

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 S-1128-385-57 into the Title V operating permit. The proposed modification authorizes the installation of up to one 75 bbl separator vessel and up to two heat exchangers and associated equipment.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-1128-385-57, 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.

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: Gerardo C. Rios, EPA (w/enclosure) via email

**Sayed Sadredin**  
Executive Director/Air Pollution Control Officer

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

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

[www.healthyliving.com](http://www.healthyliving.com)

# TITLE V APPLICATION REVIEW

Minor Modification  
Project #: S-1123060

Engineer: Kris Rickards  
Date: July 23, 2013

Facility Number: S-1128  
Facility Name: Chevron U.S.A., Inc.  
Mailing Address: P.O. Box 1392  
Bakersfield, CA 93302

*Reviewed by AP SURR AQE*

JUL 25 2013

Contact Name: KD Bone  
Phone: 661-654-7150

Responsible Official: David Brantley  
Title: Thermal Supervisor

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## I. PROPOSAL

Chevron U.S.A., Inc. is proposing a Title V minor permit modification to incorporate the recently issued S-1128-385-57 into the Title V operating permit. The proposed modification authorizes the installation of up to one 75 bbl separator vessel and up to two heat exchangers and associated equipment.

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

The equipment will be located at the Cymric Oilfield within CUSA's Heavy Oil Western Stationary Source within Kern County.

## III. EQUIPMENT DESCRIPTION

**S-1128-385-62:** THERMALLY ENHANCED OIL RECOVERY (TEOR) OPERATION WELL VENT VAPOR CONTROL SYSTEM #CC-1Y SERVING 770 STEAM ENHANCED WELLS INCLUDING HEAT EXCHANGERS, GAS/LIQUID SEPARATORS, COMPRESSORS, GAS FLOW AND TEMPERATURE INDICATORS, AUTOMATIC WELL TEST STATIONS, AND GAS PIPING TO SCRUBBED STEAM GENERATORS, OR DOGGR APPROVED DISPOSAL WELL(S)

#### 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

Permit condition 5 was modified as follows to reflect the increase in fugitive emissions associated with the proposed equipment:

- Fugitive VOC emissions from components in vapor and condensate service shall not exceed 364380.0 lb/day. [District Rule 2201]

The following conditions were added or modified for compliance with the recently adopted Rule 4401:

- Permittee shall keep steam-enhanced crude oil production wells operated with open vents connected to a VOC collection and control system. Steam-enhanced crude oil production wells operated with closed vents shall produce to front-line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) and are connected to a VOC collection and control system. The well vent may be temporarily opened during periods of attended service or repair of the well provided such activity is done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401]
- Permittee shall install and maintain an APCO-approved VOC collection and control system that is not open to the atmosphere and that is composed of hard-piping, ductwork connections and, if necessary, flow inducing devices that transport gas or vapor from a piece or pieces of equipment to an APCO-approved control device that has a VOC destruction or removal efficiency of at least 99%, or that transports gases or vapors back to a process system. [District Rules 2201 and 4401]

- During District compliance inspection, the following conditions shall be used for determination of a violation: 1) Existence of an open-ended line or a valve located at the end of the line that is not sealed with a blind flange, plug, cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended lines. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere; 2) Existence of a component with a major liquid leak; 3) Existence of a component with a gas leak greater than 50,000 ppmv; or 4) Existence of a component leak consisting of a minor liquid or gas leak, or a gas leak greater than 10,000 ppmv up to 50,000 ppmv, in excess of the allowable number of leaks specified in Table 3 of Rule 4401 (as amended December 14, 2006). [District Rule 4401]
- Permittee shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401]
- Any audio-visual inspection of an accessible operating pump, compressor, and PRD performed by an operator that indicates a leak that cannot be immediately repaired to meet the leak standards of Rule 4401 shall be inspected not later than 24 hours after conducting the audio-visual inspection. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 4 3 of Rule 4401. [District Rule 4401]
- Except for leaking critical components or leaking essential components, if the operator has minimized a leak but the leak still exceeds the applicable leak limits, the operator shall comply with at least one of the following requirements as soon as practicable but not later than the time period specified in Table 34 of Rule 4401: 1) repair or replace the leaking component; 2) vent the leaking component to a VOC collection and control system; or 3) remove the leaking component from operation. [District Rule 4401]
- The leak rate, measured after leak minimization has been performed, shall be used to determine the applicable repair period specified in Table 34 of Rule 4401 and the time of initial leak detection shall be the start of the repair period specified in Table 34 of Rule 4401. [District Rule 4401]
- The inspection and re-inspection requirements of Rule 4401, Sections 5.8.1 through 5.8.5, do not apply to components exclusively handling gas/vapor or liquid with a VOC content of ten percent or less ( 10 wt. %) as determined using ASTM Method D1945 for gases and SCAQMD Method 304-91, or the latest revision of ASTM Methods E168, E169 or E260, for liquids. [District Rule 4401]

## 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 S-1128-385-62
- B. Authority to Construct S-1128-385-57
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit S-1128-385-61

# ATTACHMENT A

Proposed Modified Title V Operating Permit  
(S-1128-385-62)

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1128-385-62

**EXPIRATION DATE:** 02/29/2016

**SECTION:** 1 **TOWNSHIP:** 30S **RANGE:** 21E

## **EQUIPMENT DESCRIPTION:**

THERMALLY ENHANCED OIL RECOVERY (TEOR) OPERATION WELL VENT VAPOR CONTROL SYSTEM #CC-1Y SERVING 770 STEAM ENHANCED WELLS INCLUDING HEAT EXCHANGERS, GAS/LIQUID SEPARATORS, COMPRESSORS, GAS FLOW AND TEMPERATURE INDICATORS, AUTOMATIC WELL TEST STATIONS, AND GAS PIPING TO SCRUBBED STEAM GENERATORS, OR DOGGR APPROVED DISPOSAL WELL(S)

## **PERMIT UNIT REQUIREMENTS**

1. {1294} The crude oil production from wells associated with this permit unit shall not lie within 1000 feet of an air injection well used for in-situ combustion. [District Rule 4407, 2.0, 3.4, and 3.5] Federally Enforceable Through Title V Permit
2. The operation includes gauge vessel(s), heat exchanger(s), gas/liquid separator(s), condensate tank(s), vapor compressor(s), gas volume flow rate and temperature indicators, and gas piping to either TEOR permit S-1128-116 collection system, TEOR permit S-1128-130 collection system, scrubbed steam generators S-1128-3, '-24, '-25, '-26, and '-29 through '-34, or DOGGR approved disposal well(s). [District Rule 2201] Federally Enforceable Through Title V Permit
3. VOC content of hydrocarbons in gas processed shall not exceed 50% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Fugitive VOC emissions from components in vapor and condensate service shall not exceed 380.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Fugitive VOC limit listed above does not include components at the well-head up to the point of initial gas/liquid separation, or existing production handling or flow measurement facilities, or shown to be handling produced fluids with an API gravity less than 30 degrees or fluid streams containing more than 50% water (by weight) or with a VOC content of 10% (by weight) or less. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Components to be screened and counted for determining compliance with fugitive VOC limit listed above shall be identified and categorized according to the appropriate fluid types (gas or water/oil) in Table 2-4 of the EPA's "1995 Protocol for Equipment Leak Emission Estimates" (EPA-453/R-95-017) and the following component types: valves, fittings, threaded connections, open-ended lines, pumps, compressors, pressure relief devices, pipes, flanges, process drains, sealing mechanisms, hatches, sight-glasses, meters, or seal fluid systems. [District Rule 2201] Federally Enforceable Through Title V Permit
7. {1296} All required source testing shall conform to the compliance testing procedures described in District Rule 1081(as amended December 16, 1993). [District Rule 1081 and County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera)] Federally Enforceable Through Title V Permit
8. Permittee shall maintain with the permit a current listing of all steam enhanced wells connected to the casing vent control system and a copy of DOGGR approval of disposal well(s). [District Rule 2520, 9.4.2] 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.

9. Permittee shall maintain for a period of five years, accurate daily records of volume of vapors handled, a list of all thermally enhanced production wells associated with this operation, accurate records of fugitive inspection component counts and leak inspection results, and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Permittee shall maintain with the permit accurate fugitive component counts of vapor and condensate handling equipment and resulting emissions calculated using the EPA "1995 Protocol for Equipment Leak Emission Estimates" (EPA-453/R-95-017), Oil and Gas Production Operations Average Emission Factors, Table 2-4. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Permittee shall maintain a written record of VOC content of the gas (sampled not less than annually) and shall make such records available for District inspection upon request for a period of five years. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Permittee shall keep steam-enhanced crude oil production wells operated with open vents connected to a VOC collection and control system. Steam-enhanced crude oil production wells operated with closed vents shall produce to front-line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) and are connected to a VOC collection and control system. The well vent may be temporarily opened during periods of attended service or repair of the well provided such activity is done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401] Federally Enforceable Through Title V Permit
13. Permittee shall install and maintain an APCO-approved VOC collection and control system that is not open to the atmosphere and that is composed of hard-piping, ductwork connections and, if necessary, flow inducing devices that transport gas or vapor from a piece or pieces of equipment to an APCO-approved control device that has a VOC destruction or removal efficiency of at least 99%, or that transports gases or vapors back to a process system. [District Rules 2201 and 4401] Federally Enforceable Through Title V Permit
14. 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 requirements of District Rule 4401, (as amended December 14, 2006). [District Rule 4401] Federally Enforceable Through Title V Permit
15. The permittee shall not use any components that leak in excess of the applicable leak standards as specified in this permit. Components that have been found leaking in excess of the applicable leak standards of this rule may be used provided such leaking components have been identified with a tag for repair, are repaired, or are awaiting re-inspection after being repaired, within the applicable time period specified in this permit. [District Rule 4401] Federally Enforceable Through Title V Permit
16. Permittee shall maintain a copy of the latest APCO-approved Operator Management Plan (OMP) at the facility and make it available to the APCO, ARB, and US EPA upon request. [District Rule 4401] Federally Enforceable Through Title V Permit
17. By January 30 of each year, permittee shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4401] Federally Enforceable Through Title V Permit
18. In accordance with the approved OMP, permittee shall meet all applicable operating, leak standards, inspection and re-inspection, leak repair, record keeping, and notification requirements of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
19. A gas leak is defined as the detection of a concentration of total organic compounds, above background (measured in accordance with EPA Method 21) that exceeds the following values: 1) A major gas leak is a detection of greater than 10,000 ppmv as methane; and 2) A minor gas leak is a detection of 400 to 10,000 ppmv as methane for pressure relief devices (PRDs) and 2,000 to 10,000 for components other than PRDs. [District Rule 4401] Federally Enforceable Through Title V Permit
20. A liquid leak is defined as the dripping of VOC-containing liquid. A major liquid leak is a visible mist or a continuous flow of liquid that is not seal lubricant. A minor liquid leak is a liquid leak that is not a major liquid leak and drips liquid at a rate of more than three drops per minute, except for seal lubricant. [District Rule 4401] 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. During District compliance inspection, the following conditions shall be used for determination of a violation: 1) Existence of an open-ended line or a valve located at the end of the line that is not sealed with a blind flange, plug, cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended lines. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere; 2) Existence of a component with a major liquid leak; 3) Existence of a component with a gas leak greater than 50,000 ppmv; or 4) Existence of a component leak consisting of a minor liquid or gas leak, or a gas leak greater than 10,000 ppmv up to 50,000 ppmv, in excess of the allowable number of leaks specified in Table 3 of Rule 4401 (as amended December 14, 2006). [District Rule 4401] Federally Enforceable Through Title V Permit
22. Permittee shall keep all hatches closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401] Federally Enforceable Through Title V Permit
23. Permittee shall visually inspect all pipes at least once every year. Any visual inspection of pipes that indicates a leak that cannot be immediately repaired to meet the leak standards of Rule 4401 shall be inspected within 24 hours after detecting the leak. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 4 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
24. Permittee shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401] Federally Enforceable Through Title V Permit
25. Permittee shall inspect audio-visually (by hearing and by sight) for leaks all accessible operating pumps, compressors, and pressure relief devices (PRDs) in service at least once each calendar week. [District Rule 4401] Federally Enforceable Through Title V Permit
26. Any audio-visual inspection of an accessible operating pump, compressor, and PRD performed by an operator that indicates a leak that cannot be immediately repaired to meet the leak standards of Rule 4401 shall be inspected not later than 24 hours after conducting the audio-visual inspection. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 4 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
27. Permittee shall initially inspect a PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the discovery of the release. Permittee shall re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection. [District Rule 4401] Federally Enforceable Through Title V Permit
28. Permittee shall inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. [District Rule 4401] Federally Enforceable Through Title V Permit
29. Except for PRDs, permittee shall inspect a component that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. [District Rule 4401] Federally Enforceable Through Title V Permit
30. Permittee shall affix a readily visible weatherproof tag to a leaking component upon detection of the leak. The following information shall be included on the tag: 1) the date and time of leak detection; 2) the date and time of leak measurement; 3) leak concentration in ppmv for a gaseous leak; 4) description of whether it is a major liquid leak or a minor liquid leak; and 5) whether the component is an essential component, an unsafe-to-monitor component, or a critical component. [District Rule 4401] Federally Enforceable Through Title V Permit
31. Permittee shall keep the tag affixed to the component until all of the following conditions have been met: 1) the leaking component has been repaired or replaced, and 2) the component has been re-inspected using the test methods described in this permit; and 3) the component is found to be in compliance with the requirements of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
32. Permittee shall minimize a component leak in order to stop or reduce leakage to the atmosphere immediately to the extent possible, but not later than one (1) hour after detection of the leak. [District Rule 4401] 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.

33. Except for leaking critical components or leaking essential components, if the operator has minimized a leak but the leak still exceeds the applicable leak limits, the operator shall comply with at least one of the following requirements as soon as practicable but not later than the time period specified in Table 4 of Rule 4401: 1) repair or replace the leaking component; 2) vent the leaking component to a VOC collection and control system; or 3) remove the leaking component from operation. [District Rule 4401] Federally Enforceable Through Title V Permit
34. The leak rate, measured after leak minimization has been performed, shall be used to determine the applicable repair period specified in Table 4 of Rule 4401 and the time of initial leak detection shall be the start of the repair period specified in Table 4 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
35. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401] Federally Enforceable Through Title V Permit
36. Permittee shall maintain an inspection log in which, at a minimum, all of the following information shall be recorded for each inspection performed: 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 of leak detection and the method of leak detection; 4) For gaseous leaks, the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak; 5) The date of repair, replacement, or removal from operation of leaking components; 6) The identify and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier; 7) The methods used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier; 8) The date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced; 9) The inspector's name, business 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] Federally Enforceable Through Title V Permit
37. Permittee shall perform leak inspections at least annually, using a portable hydrocarbon detection instrument in accordance with USEPA Method 21. Where safety is a concern, such as measuring leaks from compressor seals or pump seals when the shaft is rotating, a person shall measure leaks by placing the instrument probe inlet at a distance of one centimeter or less from the surface of the component interface. [District Rule 4401] Federally Enforceable Through Title V Permit
38. The inspection and re-inspection requirements of Rule 4401, Sections 5.8.1 through 5.8.5, do not apply to components exclusively handling gas/vapor or liquid with a VOC content of ten percent or less ( 10 wt. %) as determined using ASTM Method D1945 for gases and SCAQMD Method 304-91, or the latest revision of ASTM Methods E168, E169 or E260, for liquids. [District Rule 4401] Federally Enforceable Through Title V Permit
39. Annual control efficiency compliance tests shall be performed by source testers certified by the California Air Resource Board (CARB) on all vapor collection and control systems used to control emissions from steam-enhanced crude oil production wells. Testing shall be performed during June, July, August, or September of each year if the system's control efficiency is dependent upon ambient air temperature. The APCO may waive these source testing requirements if the vapor control system does not exhaust to atmosphere, or if all uncondensed VOC emissions collected by the vapor collection and control system are incinerated in fuel burning equipment, an internal combustion engine, or in a smokeless flare. [District Rule 4401] Federally Enforceable Through Title V Permit
40. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or 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 those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4401] 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.

41. 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 ARB Method 432. [District Rule 4401] Federally Enforceable Through Title V Permit
42. VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401] Federally Enforceable Through Title V Permit
43. Permittee shall maintain a current listing of wells with a packer installed and include the label "Packer" on wells with packers. Wells with a packer are not subject to VOC emissions checks and are not open-ended lines under Rule 4401. [District Rules 2201 and 4401] Federally Enforceable Through Title V Permit
44. The requirements of Rule 4401 do not apply to components serving the produced fluid line. [District Rule 4401] Federally Enforceable Through Title V Permit
45. Except for the requirements of Sections 6.1, 6.6.6, and 7.2 of Rule 4401, the requirements of Rule 4401 shall not apply to the following components: pressure relief devices, pumps, and compressors that are enclosed and whose emissions are controlled with an operating VOC collection and control system, components buried below ground, components used exclusively in vacuum service, and one-half inch nominal or less stainless steel tube fittings which have been demonstrated to the APCO to be leak-free based on initial inspection using EPA Test Method 21. [District Rule 4401] Federally Enforceable Through Title V Permit
46. Permittee shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures, as necessary. Permittee shall maintain at the facility the copies of the training records of the training program. [District Rule 4401] Federally Enforceable Through Title V Permit
47. Unless waived by the District, permittee shall maintain source test records which show that the control efficiency requirements of the VOC collection and control system have been satisfied. [District Rule 4401] Federally Enforceable Through Title V Permit
48. Permittee shall maintain monitoring records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401] Federally Enforceable Through Title V Permit
49. Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components. The records shall include a copy of the current calibration gas certification from the vendor of the calibration gas cylinder, the date of calibration, the concentration of calibration gas, the instrument reading of calibration gas before adjustment, the instrument reading of calibration gas after adjustment, the calibration gas expiration date, and the calibration gas cylinder pressure at the time of calibration. [District Rule 4401] Federally Enforceable Through Title V Permit

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

DRAFT

# ATTACHMENT B

Authority to Construct  
(S-1128-385-57)

# AUTHORITY TO CONSTRUCT

PERMIT NO: S-1128-385-57

ISSUANCE DATE: 08/02/2010

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

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE  
KERN COUNTY

SECTION: 1 TOWNSHIP: 30S RANGE: 21E

## EQUIPMENT DESCRIPTION:

MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY (TEOR) OPERATION WELL VENT VAPOR CONTROL SYSTEM #CC-1Y SERVING 770 STEAM ENHANCED WELLS INCLUDING HEAT EXCHANGERS, GAS/LIQUID SEPARATORS, COMPRESSORS, GAS FLOW AND TEMPERATURE INDICATORS, AUTOMATIC WELL TEST STATIONS, AND GAS PIPING TO SULFEROX PLANT S-1128-116, SCRUBBED STEAM GENERATORS, OR DOGGR APPROVED DISPOSAL WELL(S): INSTALL UP TO ONE NOMINAL 75 BBL (6' DIA X 15' LONG) SEPARATOR VESSEL AND UP TO TWO NEW HEAT EXCHANGERS AND ASSOCIATED GAS AND/OR LIQUID PIPING (AND ANCILLARY EQUIPMENT) AT EITHER GAUGE SETTING #6 (SEC 1, T30S, R21E), THE NORTH END COOLING PLANT (SEC 36, T29S, R21E) OR THE 6Z COOLING PLANT (SEC 6, T30S, R22E) (REVISED 6/4/12)

## 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. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantities of emissions: 1st quarter - 1,460 lb, 2nd quarter - 1,460 lb, 3rd quarter - 1,460 lb, and fourth quarter - 1,460 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201]
3. ERC Certificate Number S-3222-1 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct [District Rule 2201]
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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-1128-385-57 : Jul 19 2013 2:37PM -- RICKARDK : Joint Inspection NOT Required

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

5. The crude oil production from wells associated with this permit unit shall not lie within 1000 feet of an air injection well used for in-situ combustion. [District Rule 4407, 2.0, 3.4, and 3.5] Federally Enforceable Through Title V Permit
6. The operation includes gauge vessel(s), heat exchanger(s), gas/liquid separator(s), condensate tank(s), vapor compressor(s), gas volume flow rate and temperature indicators, and gas piping to either TEOR permit S-1128-116 collection system, TEOR permit S-1128-130 collection system, scrubbed steam generators S-1128-3, '-24, '-25, '-26, and '-29 through '-34, or DOGGR approved disposal well(s). [District NSR Rule] Federally Enforceable Through Title V Permit
7. VOC content of hydrocarbons in gas processed shall not exceed 50% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Fugitive VOC emissions from components in vapor and condensate service shall not exceed 380.0 lb/day. [District Rule 2201]
9. Fugitive VOC limit listed above does not include components at the well-head up to the point of initial gas/liquid separation, or existing production handling or flow measurement facilities, or shown to be handling produced fluids with an API gravity less than 30 degrees or fluid streams containing more than 50% water (by weight) or with a VOC content of 10% (by weight) or less. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Components to be screened and counted for determining compliance with fugitive VOC limit listed above shall be identified and categorized according to the appropriate fluid types (gas or water/oil) in Table 2-4 of the EPA's "1995 Protocol for Equipment Leak Emission Estimates" (EPA-453/R-95-017) and the following component types: valves, fittings, threaded connections, open-ended lines, pumps, compressors, pressure relief devices, pipes, flanges, process drains, sealing mechanisms, hatches, sight-glasses, meters, or seal fluid systems. [District Rule 2201] Federally Enforceable Through Title V Permit
11. All required source testing shall conform to the compliance testing procedures described in District Rule 1081(as amended December 16, 1993). [District Rule 1081 and County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera)] Federally Enforceable Through Title V Permit
12. Permittee shall maintain with the permit a current listing of all steam enhanced wells connected to the casing vent control system and a copy of DOGGR approval of disposal well(s). [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
13. Permittee shall maintain for a period of five years, accurate daily records of volume of vapors handled, a list of all thermally enhanced production wells associated with this operation, accurate records of fugitive inspection component counts and leak inspection results, and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Permittee shall maintain with the permit accurate fugitive component counts of vapor and condensate handling equipment and resulting emissions calculated using the EPA "1995 Protocol for Equipment Leak Emission Estimates" (EPA-453/R-95-017), Oil and Gas Production Operations Average Emission Factors, Table 2-4. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Permittee shall maintain a written record of VOC content of the gas (sampled not less than annually) and shall make such records available for District inspection upon request for a period of five years. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Permittee shall keep steam-enhanced crude oil production wells operated with open vents connected to a VOC collection and control system. Steam-enhanced crude oil production wells operated with closed vents shall produce to front-line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) and are connected to a VOC collection and control system. The well vent may be temporarily opened during periods of attended service or repair of the well provided such activity is done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

17. Permittee shall install and maintain an APCO-approved VOC collection and control system that is not open to the atmosphere and that is composed of hard-piping, ductwork connections and, if necessary, flow inducing devices that transport gas or vapor from a piece or pieces of equipment to an APCO-approved control device that has a VOC destruction or removal efficiency of at least 99%, or that transports gases or vapors back to a process system. [District Rules 2201 and 4401] Federally Enforceable Through Title V Permit
18. 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 requirements of District Rule 4401, (as amended December 14, 2006). [District Rule 4401] Federally Enforceable Through Title V Permit
19. The permittee shall not use any components that leak in excess of the applicable leak standards as specified in this permit. Components that have been found leaking in excess of the applicable leak standards of this rule may be used provided such leaking components have been identified with a tag for repair, are repaired, or are awaiting re-inspection after being repaired, within the applicable time period specified in this permit. [District Rule 4401] Federally Enforceable Through Title V Permit
20. Permittee shall maintain a copy of the latest APCO-approved Operator Management Plan (OMP) at the facility and make it available to the APCO, ARB, and US EPA upon request. [District Rule 4401] Federally Enforceable Through Title V Permit
21. By January 30 of each year, permittee shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4401] Federally Enforceable Through Title V Permit
22. In accordance with the approved OMP, permittee shall meet all applicable operating, leak standards, inspection and re-inspection, leak repair, record keeping, and notification requirements of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
23. A gas leak is defined as the detection of a concentration of total organic compounds, above background (measured in accordance with EPA Method 21) that exceeds the following values: 1) A major gas leak is a detection of greater than 10,000 ppmv as methane; and 2) A minor gas leak is a detection of 400 to 10,000 ppmv as methane for pressure relief devices (PRDs) and 2,000 to 10,000 for components other than PRDs. [District Rule 4401] Federally Enforceable Through Title V Permit
24. A liquid leak is defined as the dripping of VOC-containing liquid. A major liquid leak is a visible mist or a continuous flow of liquid that is not seal lubricant. A minor liquid leak is a liquid leak that is not a major liquid leak and drips liquid at a rate of more than three drops per minute, except for seal lubricant. [District Rule 4401] Federally Enforceable Through Title V Permit
25. During District compliance inspection, the following conditions shall be used for determination of a violation: 1) Existence of an open-ended line or a valve located at the end of the line that is not sealed with a blind flange, plug, cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended lines. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere; 2) Existence of a component with a major liquid leak; 3) Existence of a component with a gas leak greater than 50,000 ppmv; or 4) Existence of a component leak consisting of a minor liquid or gas leak, or a gas leak greater than 10,000 ppmv up to 50,000 ppmv, in excess of the allowable number of leaks specified in Table 3 of Rule 4401 (as amended December 14, 2006). [District Rule 4401] Federally Enforceable Through Title V Permit
26. Permittee shall keep all hatches closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401] Federally Enforceable Through Title V Permit
27. Permittee shall visually inspect all pipes at least once every year. Any visual inspection of pipes that indicates a leak that cannot be immediately repaired to meet the leak standards of Rule 4401 shall be inspected within 24 hours after detecting the leak. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 4 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
28. Permittee shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

29. Permittee shall inspect audio-visually (by hearing and by sight) for leaks all accessible operating pumps, compressors, and pressure relief devices (PRDs) in service at least once each calendar week. [District Rule 4401] Federally Enforceable Through Title V Permit
30. Any audio-visual inspection of an accessible operating pump, compressor, and PRD performed by an operator that indicates a leak that cannot be immediately repaired to meet the leak standards of Rule 4401 shall be inspected not later than 24 hours after conducting the audio-visual inspection. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 4 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
31. Permittee shall initially inspect a PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the discovery of the release. Permittee shall re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection. [District Rule 4401] Federally Enforceable Through Title V Permit
32. Permittee shall inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. [District Rule 4401] Federally Enforceable Through Title V Permit
33. Except for PRDs, permittee shall inspect a component that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. [District Rule 4401] Federally Enforceable Through Title V Permit
34. Permittee shall affix a readily visible weatherproof tag to a leaking component upon detection of the leak. The following information shall be included on the tag: 1) the date and time of leak detection; 2) the date and time of leak measurement; 3) leak concentration in ppmv for a gaseous leak; 4) description of whether it is a major liquid leak or a minor liquid leak; and 5) whether the component is an essential component, an unsafe-to-monitor component, or a critical component. [District Rule 4401] Federally Enforceable Through Title V Permit
35. Permittee shall keep the tag affixed to the component until all of the following conditions have been met: 1) the leaking component has been repaired or replaced, and 2) the component has been re-inspected using the test methods described in this permit; and 3) the component is found to be in compliance with the requirements of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
36. Permittee shall minimize a component leak in order to stop or reduce leakage to the atmosphere immediately to the extent possible, but not later than one (1) hour after detection of the leak. [District Rule 4401] Federally Enforceable Through Title V Permit
37. Except for leaking critical components or leaking essential components, if the operator has minimized a leak but the leak still exceeds the applicable leak limits, the operator shall comply with at least one of the following requirements as soon as practicable but not later than the time period specified in Table 4 of Rule 4401: 1) repair or replace the leaking component; 2) vent the leaking component to a VOC collection and control system; or 3) remove the leaking component from operation. [District Rule 4401] Federally Enforceable Through Title V Permit
38. The leak rate, measured after leak minimization has been performed, shall be used to determine the applicable repair period specified in Table 4 of Rule 4401 and the time of initial leak detection shall be the start of the repair period specified in Table 4 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
39. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

40. Permittee shall maintain an inspection log in which, at a minimum, all of the following information shall be recorded for each inspection performed: 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 of leak detection and the method of leak detection; 4) For gaseous leaks, the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak; 5) The date of repair, replacement, or removal from operation of leaking components; 6) The identify and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier; 7) The methods used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier; 8) The date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced; 9) The inspector's name, business 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] Federally Enforceable Through Title V Permit
41. Permittee shall perform leak inspections at least annually, using a portable hydrocarbon detection instrument in accordance with USEPA Method 21. Where safety is a concern, such as measuring leaks from compressor seals or pump seals when the shaft is rotating, a person shall measure leaks by placing the instrument probe inlet at a distance of one centimeter or less from the surface of the component interface. [District Rule 4401] Federally Enforceable Through Title V Permit
42. The inspection and re-inspection requirements of Rule 4401, Sections 5.8.1 through 5.8.5, do not apply to components exclusively handling gas/vapor or liquid with a VOC content of ten percent or less ( 10 wt. %) as determined using ASTM Method D1945 for gases and SCAQMD Method 304-91, or the latest revision of ASTM Methods E168, E169 or E260, for liquids. [District Rule 4401] Federally Enforceable Through Title V Permit
43. Annual control efficiency compliance tests shall be performed by source testers certified by the California Air Resource Board (CARB) on all vapor collection and control systems used to control emissions from steam-enhanced crude oil production wells. Testing shall be performed during June, July, August, or September of each year if the system's control efficiency is dependent upon ambient air temperature. The APCO may waive these source testing requirements if the vapor control system does not exhaust to atmosphere, or if all uncondensed VOC emissions collected by the vapor collection and control system are incinerated in fuel burning equipment, an internal combustion engine, or in a smokeless flare. [District Rule 4401] Federally Enforceable Through Title V Permit
44. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or 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 those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4401] Federally Enforceable Through Title V Permit
45. VOC content shall be determined using ASTM Method E168-67, E169-63, or E260-73 as applicable. Halogenated exempt compounds shall be determined by ARB Method 422. [District Rule 4401] Federally Enforceable Through Title V Permit
46. VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401] Federally Enforceable Through Title V Permit
47. Permittee shall maintain a current listing of wells with a packer installed and include the label "Packer" on wells with packers. Wells with a packer are not subject to VOC emissions checks and are not open-ended lines under Rule 4401. [District Rules 2201 and 4401] Federally Enforceable Through Title V Permit
48. The requirements of Rule 4401 do not apply to components serving the produced fluid line. [District Rule 4401] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

49. Except for the requirements of Sections 6.1, 6.6.6, and 7.2 of Rule 4401, the requirements of Rule 4401 shall not apply to the following components: pressure relief devices, pumps, and compressors that are enclosed and whose emissions are controlled with an operating VOC collection and control system, components buried below ground, components used exclusively in vacuum service, and one-half inch nominal or less stainless steel tube fittings which have been demonstrated to the APCO to be leak-free based on initial inspection using EPA Test Method 21. [District Rule 4401] Federally Enforceable Through Title V Permit
50. Permittee shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures, as necessary. Permittee shall maintain at the facility the copies of the training records of the training program. [District Rule 4401] Federally Enforceable Through Title V Permit
51. Unless waived by the District, permittee shall maintain source test records which show that the control efficiency requirements of the VOC collection and control system have been satisfied. [District Rule 4401] Federally Enforceable Through Title V Permit
52. Permittee shall maintain monitoring records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401] Federally Enforceable Through Title V Permit
53. Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components. The records shall include a copy of the current calibration gas certification from the vendor of the calibration gas cylinder, the date of calibration, the concentration of calibration gas, the instrument reading of calibration gas before adjustment, the instrument reading of calibration gas after adjustment, the calibration gas expiration date, and the calibration gas cylinder pressure at the time of calibration. [District Rule 4401] Federally Enforceable Through Title V Permit
54. All records required by this permit shall be maintained and retained on-site for a minimum of five (5) years and made available for District, ARB, and EPA inspection upon request. [District Rule 4401] Federally Enforceable Through Title V Permit
55. Authority to Construct S-1128-385-56 shall be implemented prior to or concurrently with this ATC. [District Rule 2201]

# ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
S-1128-385	0	0	0	0	0
<b>TOTAL</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

# ATTACHMENT D

Application

# San Joaquin Valley Air Pollution Control District

www.valleyair.org

RECEIVED  
**AUG - 1 2012**

SJVAPCD  
Southern Region

## Permit Application For:

[ ] ADMINISTRATIVE AMENDMENT    [X] MINOR MODIFICATION    [ ] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <b>Chevron U.S.A. Inc. (CUSA)</b>		
2. MAILING ADDRESS:		
STREET/P.O. BOX: <b>PO Box 1392</b>		
CITY: <b>Bakersfield</b>	STATE: <b>CA</b>	9-DIGIT ZIP CODE: <b>93302</b>
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:		INSTALLATION DATE:
STREET: <b>Heavy Oil Western Source – Cymric</b> CITY: _____		<b>3rd Quarter 2012 or As Needed</b>
_____ ¼ SECTION <b>1</b> TOWNSHIP <b>30S</b> RANGE <b>21E</b>		
4. GENERAL NATURE OF BUSINESS: <b>Oil and gas production</b>		
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)		
<b>Implement ATC No. S-1128-385-57 issued at the completion of Project #S-1101450.</b>		
6. TYPE OR PRINT NAME OF APPLICANT:		TITLE OF APPLICANT:
<b>Jason Donchin</b>		<b>SJVBU HES Manager</b>
7. SIGNATURE OF APPLICANT:	DATE:	PHONE: (661) 654-7150
<i>Signature for Jason Donchin</i>	<b>08/01/2012</b>	FAX: (661) 654-7004
		EMAIL: dbone@chevron.com

**For APCD Use Only:**

*Title V - Minor Mod*

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____ DATE PAID: _____ PROJECT NO: <b>S-1123060</b> FACILITY ID: <b>S-1128</b>
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RECEIVED  
AUG - 1 2012  
SJVAPCD  
Southern Region

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: <b>Chevron U.S.A. Inc. (CUSA)</b>	FACILITY ID: <b>S-1128</b>
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: <b>Chevron U.S.A. Inc. (CUSA)</b>	
3. Agent to the Owner: <b>N/A</b>	

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

- DWB*  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).
- DWB*  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.
- DWB*  Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- DWB*  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:

*David A. Brantley*  
Signature of Responsible Official

August 1, 2012  
Date

David Brantley  
Name of Responsible Official (please print)

Implement ATCS-1128-385-57

Thermal Supervisor  
Title of Responsible Official (please print)

# ATTACHMENT E

Previous Title V Operating Permit  
(S-1128-385-61)

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1128-385-61

**EXPIRATION DATE:** 02/29/2016

**SECTION:** 1 **TOWNSHIP:** 30S **RANGE:** 21E

## **EQUIPMENT DESCRIPTION:**

THERMALLY ENHANCED OIL RECOVERY (TEOR) OPERATION WELL VENT VAPOR CONTROL SYSTEM #CC-1Y SERVING 770 STEAM ENHANCED WELLS INCLUDING HEAT EXCHANGERS, GAS/LIQUID SEPARATORS, COMPRESSORS, GAS FLOW AND TEMPERATURE INDICATORS, AUTOMATIC WELL TEST STATIONS, AND GAS PIPING TO SCRUBBED STEAM GENERATORS, OR DOGGR APPROVED DISPOSAL WELL(S)

## **PERMIT UNIT REQUIREMENTS**

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1. The crude oil production from wells associated with this permit unit shall not lie within 1000 feet of an air injection well used for in-situ combustion. [District Rule 4407] Federally Enforceable Through Title V Permit
2. The operation includes gauge vessel(s), heat exchanger(s), gas/liquid separator(s), condensate tank(s), vapor compressor(s), gas volume flow rate and temperature indicators, and gas piping to either TEOR permit S-1128-116 collection system, TEOR permit S-1128-130 collection system, scrubbed steam generators S-1128-3, '-24, '-25, '-26, and '-29 through '-34, or DOGGR approved disposal well(s). [District Rule 2201] Federally Enforceable Through Title V Permit
3. VOC content of hydrocarbons in gas processed shall not exceed 50% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Fugitive VOC emissions from components in vapor and condensate service shall not exceed 364 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Fugitive VOC limit listed above does not include components at the well-head up to the point of initial gas/liquid separation, or existing production handling or flow measurement facilities, or shown to be handling produced fluids with an API gravity less than 30 degrees or fluid streams containing more than 50% water (by weight) or with a VOC content of 10% (by weight) or less. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Components to be screened and counted for determining compliance with fugitive VOC limit listed above shall be identified and categorized according to the appropriate fluid types (gas or water/oil) in Table 2-4 of the EPA's "1995 Protocol for Equipment Leak Emission Estimates" (EPA-453/R-95-017) and the following component types: valves, fittings, threaded connections, open-ended lines, pumps, compressors, pressure relief devices, pipes, flanges, process drains, sealing mechanisms, hatches, sight-glasses, meters, or seal fluid systems. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All required source testing shall conform to the compliance testing procedures described in District Rule 1081(as amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
8. Permittee shall maintain with the permit a current listing of all steam enhanced wells connected to the casing vent control system and a copy of DOGGR approval of disposal well(s). [District Rule 2520] Federally Enforceable Through Title V Permit
9. Permittee shall maintain for a period of five years, accurate daily records of volume of vapors handled, a list of all thermally enhanced production wells associated with this operation, accurate records of fugitive inspection component counts and leak inspection results, and make such records readily available for District inspection upon request. [District Rule 2201] 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. Permittee shall maintain with the permit accurate fugitive component counts of vapor and condensate handling equipment and resulting emissions calculated using the EPA "1995 Protocol for Equipment Leak Emission Estimates" (EPA-453/R-95-017), Oil and Gas Production Operations Average Emission Factors, Table 2-4. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Permittee shall maintain a written record of VOC content of the gas (sampled not less than annually) and shall make such records available for District inspection upon request for a period of five years. [District Rule 2201] Federally Enforceable Through Title V Permit
12. A gas leak is defined as the detection of a concentration of total organic compounds, above background (measured in accordance with EPA Method 21) that exceeds the following values: 1) A major gas leak is a detection of greater than 10,000 ppmv as methane; and 2) A minor gas leak is a detection of 400 to 10,000 ppmv as methane for pressure relief devices (PRDs) and 2,000 to 10,000 for components other than PRDs. [District Rule 4401] Federally Enforceable Through Title V Permit
13. A liquid leak is defined as the dripping of VOC-containing liquid. A major liquid leak is a visible mist or a continuous flow of liquid that is not seal lubricant. A minor liquid leak is a liquid leak that is not a major liquid leak and drips liquid at a rate of more than three drops per minute, except for seal lubricant. [District Rule 4401] Federally Enforceable Through Title V Permit
14. 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. [District Rule 4401] Federally Enforceable Through Title V Permit
15. Permittee shall not operate a steam-enhanced crude oil production well unless they comply with one of the following requirements: 1) Permittee shall keep the steam-enhanced crude oil production well vents closed and the front line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) shall be connected to a VOC collection and control system. The well vent may be temporarily opened during periods of attended service or repair of the well provided such activity is done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere; or 2) Permittee shall install and maintain an APCO-approved VOC collection and control system that is not open to the atmosphere and that is composed of hard-piping, ductwork connections and, if necessary, flow inducing devices that transport gas or vapor from a piece or pieces of equipment to an APCO-approved control device that has a VOC destruction or removal efficiency of at least 99%, or that transports gases or vapors back to a process system. [District Rules 2201 and 4401] Federally Enforceable Through Title V Permit
16. During District compliance inspection, the following conditions shall be used to determination of a violation: 1) Existence of an open-ended line or a valve located at the end of the line that is not sealed with a blind flange, plug, cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended lines. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere; 2) Existence of a component with a major liquid leak; 3) Existence of a component with a gas leak greater than 50,000 ppmv; or 4) Existence of a component leak consisting of a minor liquid or gas leak, or a gas leak greater than 10,000 ppmv up to 50,000 ppmv, in excess of the allowable number of leaks specified in Table 2 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
17. The permittee shall not use any components that leak in excess of the applicable leak standards as specified in this permit. Components that have been found leaking in excess of the applicable leak standards of this rule may be used provided such leaking components have been identified with a tag for repair, are repaired, or are awaiting re-inspection after being repaired, within the applicable time period specified in this permit. [District Rule 4401] Federally Enforceable Through Title V Permit
18. Permittee shall keep all hatches closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401] Federally Enforceable Through Title V Permit

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19. Except for pipes and unsafe-to-monitor components, permittee shall visually inspect all pipes at least once every year. Any visual inspection of pipes that indicates a leak that cannot be immediately repaired to meet the leak standards of Rule 4401 shall be inspected within 24 hours after detecting the leak. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 3 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
20. Permittee shall inspect audio-visually (by hearing and by sight) for leaks all accessible operating pumps, compressors, and pressure relief devices (PRDs) in service at least once each calendar week. [District Rule 4401] Federally Enforceable Through Title V Permit
21. Any audio-visual inspection of an accessible operating pump, compressor, and PRD performed by an operator that indicates a leak that cannot be immediately repaired to meet the leak standards of Rule 4401 shall be inspected not later than 24 hours after conducting the audio-visual inspection. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 3 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
22. Permittee shall initially inspect a PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the discovery of the release. Permittee shall re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection. [District Rule 4401] Federally Enforceable Through Title V Permit
23. Permittee shall inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. [District Rule 4401] Federally Enforceable Through Title V Permit
24. Except for PRDs, permittee shall inspect a component that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. [District Rule 4401] Federally Enforceable Through Title V Permit
25. Permittee shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401] Federally Enforceable Through Title V Permit
26. Permittee shall affix a readily visible weatherproof tag to a leaking component upon detection of the leak. The following information shall be included on the tag: 1) the date and time of leak detection; 2) the date and time of leak measurement; 3) leak concentration in ppmv for a gaseous leak; 4) description of whether it is a major liquid leak or a minor liquid leak; and 5) whether the component is an essential component, an unsafe-to-monitor component, or a critical component. [District Rule 4401] Federally Enforceable Through Title V Permit
27. Permittee shall keep the tag affixed to the component until all of the following conditions have been met: 1) the leaking component has been repaired or replaced, and 2) the component has been re-inspected using the test methods described in this permit; and 3) the component is found to be in compliance with the requirements of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
28. Permittee shall minimize a component leak in order to stop or reduce leakage to the atmosphere immediately to the extent possible, but not later than one (1) hour after detection of the leak. [District Rule 4401] Federally Enforceable Through Title V Permit
29. Except for leaking critical components or leaking essential components, if the operator has minimized a leak but the leak still exceeds the applicable leak limits, the operator shall comply with at least one of the following requirements as soon as practicable but not later than the time period specified in Table 3 of Rule 4401: 1) repair or replace the leaking component; 2) vent the leaking component to a VOC collection and control system; or 3) remove the leaking component from operation. [District Rule 4401] Federally Enforceable Through Title V Permit
30. The leak rate, measured after leak minimization has been performed, shall be used to determine the applicable repair period specified in Table 3 of Rule 4401 and the time of initial leak detection shall be the start of the repair period specified in Table 3 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
31. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401] Federally Enforceable Through Title V Permit

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32. All records of required monitoring data and support information required by this permit shall be retained for a period of at least five years and shall be made available for District inspection upon request. [District Rules 2520 and 4401] Federally Enforceable Through Title V Permit
33. Permittee shall maintain monitoring records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401] Federally Enforceable Through Title V Permit
34. Unless waived by the District, permittee shall maintain source test records which show that the control efficiency requirements of the VOC collection and control system have been satisfied. [District Rule 4401] Federally Enforceable Through Title V Permit
35. Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components. The records shall include a copy of the current calibration gas certification from the vendor of the calibration gas cylinder, the date of calibration, the concentration of calibration gas, the instrument reading of calibration gas before adjustment, the instrument reading of calibration gas after adjustment, the calibration gas expiration date, and the calibration gas cylinder pressure at the time of calibration. [District Rule 4401] Federally Enforceable Through Title V Permit
36. Permittee shall maintain a copy of the latest APCO-approved Operator Management Plan (OMP) at the facility and make it available to the APCO, ARB, and US EPA upon request. [District Rule 4401] Federally Enforceable Through Title V Permit
37. Annual control efficiency compliance tests shall be performed by source testers certified by the California Air Resource Board (CARB) on all vapor collection and control systems used to control emissions from steam-enhanced crude oil production wells. Testing shall be performed during June, July, August, or September of each year if the system's control efficiency is dependent upon ambient air temperature. The APCO may waive these source testing requirements if the vapor control system does not exhaust to atmosphere, or if all uncondensed VOC emissions collected by the vapor collection and control system are incinerated in fuel burning equipment, an internal combustion engine, or in a smokeless flare. [District Rule 4401] Federally Enforceable Through Title V Permit
38. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or 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 those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4401] Federally Enforceable Through Title V Permit
39. 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 ARB Method 432. [District Rule 4401] Federally Enforceable Through Title V Permit
40. Permittee shall perform leak inspections at least annually, using a portable hydrocarbon detection instrument in accordance with USEPA Method 21. Where safety is a concern, such as measuring leaks from compressor seals or pump seals when the shaft is rotating, a person shall measure leaks by placing the instrument probe inlet at a distance of one centimeter or less from the surface of the component interface. [District Rule 4401] Federally Enforceable Through Title V Permit
41. VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401] Federally Enforceable Through Title V Permit

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42. Permittee shall maintain an inspection log in which, at a minimum, all of the following information shall be recorded for each inspection performed: 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 of leak detection and the method of leak detection; 4) For gaseous leaks, the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak; 5) The date of repair, replacement, or removal from operation of leaking components; 6) The identify and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier; 7) The methods used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier; 8) The date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced; 9) The inspector's name, business 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] Federally Enforceable Through Title V Permit
43. Permittee shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures, as necessary. Permittee shall maintain at the facility the copies of the training records of the training program. [District Rule 4401] Federally Enforceable Through Title V Permit
44. In accordance with the approved OMP, permittee shall meet all applicable operating, leak standards, inspection and re-inspection, leak repair, record keeping, and notification requirements of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
45. By January 30 of each year, permittee shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4401] Federally Enforceable Through Title V Permit
46. Permittee shall maintain a current listing of wells with a packer installed and include the label "Packer" on wells with packers. Wells with a packer are not subject to VOC emissions checks and are not open-ended lines under Rule 4401. [District Rules 2201 and 4401] Federally Enforceable Through Title V Permit
47. The requirements of Rule 4401 do not apply to components serving the produced fluid line. [District Rule 4401] Federally Enforceable Through Title V Permit
48. Except for the requirements of Sections 6.1, 6.6.6, and 7.2 of Rule 4401, the requirements of Rule 4401 shall not apply to the following components: pressure relief devices, pumps, and compressors that are enclosed and whose emissions are controlled with an operating VOC collection and control system, components buried below ground, components used exclusively in vacuum service, and one-half inch nominal or less stainless steel tube fittings which have been demonstrated to the APCO to be leak-free based on initial inspection using EPA Test Method 21. [District Rule 4401] Federally Enforceable Through Title V Permit

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