San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

OCT 02 2012

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

Re: **Notice of Minor Title V Permit Modification**
District Facility # S-1131
Project # S-1121314

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Chevron U.S.A., Inc. is proposing a Title V minor permit modification to incorporate the recently issued S-1131-1036-10 into the Title V operating permit. This modification will add 400 thermally enhanced oil recovery wells to the well roster.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-1131-1036-10, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,

David Warner
Director of Permit Services

Enclosures

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
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San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

OCT 02 2012

Lance Erickson
Chevron U.S.A., Inc.
P.O. Box 1392
Bakersfield, CA 93302

Re: Notice of Minor Title V Permit Modification
District Facility # S-1131
Project # S-1121314

Dear Mr. Erickson:

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-1131-1036-10 into the Title V operating permit. This modification will add 400 thermally enhanced oil recovery wells to the well roster.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-1131-1036-10, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,

for David Warner
Director of Permit Services

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TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1121314

Engineer: Kris Rickards
Date: September 25, 2012

Facility Number: S-1131
Facility Name: Chevron U.S.A., Inc.
Mailing Address: P.O. Box 1392
Bakersfield, CA 93302

Contact Name: Lance Erickson
Phone: 661-654-7145

Responsible Official: Gary Piron
Title: Operations Manager

I. PROPOSAL

Chevron U.S.A., Inc. is proposing a Title V minor permit modification to incorporate the recently issued S-1131-1036-10 into the Title V operating permit. This modification will add 400 thermally enhanced oil recovery wells to the well roster.

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

These wells will be located within the Kern River Oilfield within Chevron's Heavy Oil Central Stationary Source in Kern County.

III. EQUIPMENT DESCRIPTION

S-1131-1036-12: TEOR OPERATION WITH 885 THERMALLY ENHANCED WELLS WITH CLOSED CASING VENTS

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

Chevron is proposing to increase the well roster listed on permit S-1131-1036-10 by 400 wells.

Permit conditions 1 through 5 and 51 on the draft Permit to Operate were added to ensure compliance with the California Environmental Quality Act:

- When the number of wells in operation exceeds 485, before any ground disturbance activities on the project site, a qualified registered biologist shall conduct a focused survey to determine the presence/absence of potential impacts on sensitive species on-site and riparian habitat. The survey shall be conducted in accordance with the standard protocol of California Department of Fish & Game (CDFG) and/or California Department of Fish & Game (CDFG). Chevron U.S.A., Inc will notify CDFG and the US Fish and Wildlife Service (USFWS) in the event a State or Federally listed species is encountered. Results of the survey shall be made available for District inspection upon request. [Public Resources Code 21000-21177: California Environmental Quality Act]

- When the number of wells in operation exceeds 485, before any ground disturbance activities on the project site, a qualified registered biologist shall conduct a focused survey to determine the presence/absence of potential impacts on the movement of any native resident or migratory fish or wildlife species, corridors, or nursery sites. Chevron U.S.A., Inc will notify California Department of Fish & Game and the US Fish and Wildlife Service in the event a State or Federally listed species is encountered. Results of the survey shall be made available for District inspection upon request. [Public Resources Code 21000-21177: California Environmental Quality Act]

- When the number of wells in operation exceeds 485, Chevron U.S.A., Inc shall notify the US Fish and Wildlife Service (USFWS) and the California Department of Fish & Game (CDFG) immediately in the event that the Project avoidance measures fail and there is a take of a threatened or endangered species. No activities shall occur until Incidental Take authorization has been obtained from USFWS and CDFG. Documentation demonstrating authorization shall be made available for District inspection upon request. [Public Resources Code 21000-21177: California Environmental Quality Act]

- When the number of wells in operation exceeds 485, for Western Pond Turtle and American Badger: A qualified biological monitor will be present during project implementation. The biological monitor shall be notified immediately should the western pond turtle enter the project area and work shall be halted until there is no longer a potential to adversely impact the species. All vehicles and equipment entering the project area will be in good working condition and free from leaks. In the event that a vehicle or equipment item is found to be leaking fluid, operation of the vehicle or equipment item shall be terminated and it shall be repaired or replaced. If possible, repairs should be conducted in a contained area. All contaminated soil will be collected and properly disposed off the project site. To reduce the potential for direct and indirect impacts to American badger to a less-than-significant level, a qualified biologist will be retained prior to ground disturbing activities to conduct a pre-construction survey of the project area. The pre-construction survey would be conducted within the proposed project boundary and a buffer of 200 feet outside of the project footprint. If the preactivity survey indicates the presence of badger dens, they shall be classified as inactive, potentially active, or definitely active. (a) Inactive dens will be excavated by hand and backfilled to prevent reuse by badgers. (b) Potentially and definitely active dens will be monitored for three consecutive nights using a tracking medium (such as diatomaceous earth or fire clay) at the entrance. If no tracks or other sign are observed in the tracking medium at the conclusion of the three nights, the den will be excavated and backfilled by hand under the direction and supervision of a qualified biologist. If tracks are observed, the den will be progressively blocked with natural materials (dirt, sticks, and vegetation piled in front of the entrance) for the next three to five nights to discourage the badger from continued use. When a qualified biologist has determined that the den is no longer active, the den will be excavated and backfilled by hand to ensure that no badgers are trapped in the den. Results of the survey shall be made available for District inspection upon request. [Public Resources Code 21000-21177: California Environmental Quality Act]

- When the number of wells in operation exceeds 485, Chevron U.S.A., Inc shall purchase sufficient credit from the Kern Water Bank Authority (KWBA) to mitigate for permanent and temporary habitat impacts. Documentation demonstrating the purchase shall be made available for District inspection upon request. [Public Resources Code 21000-21177: California Environmental Quality Act]

- Records of wells constructed when wells in operation exceed 485 shall be maintained including location, construction start date and documentation required by California Environmental Quality Act conditions listed on this permit for a minimum of 5 years. [Public Resources Code 21000-21177: California Environmental Quality Act]

Permit conditions 6 and 7 on the draft Permit to Operate replace outdated condition 1 on the Permit to Operate:

- ~~Emissions from each closed casing vent well covered by this permit shall not exceed 0.0216 lb VOC/hr-well for components and 0.0194 lb VOC/hr-well for polished rod stuffing boxes. [District Rule 2201]~~

- Total fugitive emission of volatile organic compounds (VOC) from entire operation shall not exceed 146.6 lb/day. [District Rule 2201]

- Permittee shall maintain with the permit accurate fugitive component counts for well vent vapor control systems and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c(Feb 1999) Screening Range emission factors. [District Rule 2201]

Condition 29 on the Permit to Operate was expanded as follows and appears as condition 35 on the draft Permit to Operate:

- ~~Operator of any steam-enhanced crude oil production well shall keep an inspection log maintained pursuant to Section 6.4 of Rule 4401~~The operator shall maintain an inspection log that has been signed and dated by the facility operator responsible for the inspection, certifying the accuracy of the information recorded in the log. The inspection log shall contain, at a minimum, all of the following information: 1) The total number of components inspected, and the total number and percentage of leaking components found by component types; 2) The location, type, name or description of each leaking component and the description of any unit where the leaking component is found; 3) Date of the leak detection and method of the leak detection; 4) For gaseous leaks, record 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 the leaking component(s); 6) The identification 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 first; 7) The method(s) 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. [District Rule 4401, 6.4]

Condition 42 on the Permit to Operate was expanded as follows and appears as condition 48 on the draft Permit to Operate:

- ~~Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility.~~ The operator shall maintain an APCO approved Operator Management Plan (OMP). The OMP shall include, at a minimum, a description of all wells and all associated VOC collection and control systems subject to this rule, and all wells and all associated VOC collection and control systems that are exempt; an identification and description of any known hazard that might affect the safety of an inspector; except for pipes, the number of components that are subject to this rule by component type; except for pipes, the number and types of major components, inaccessible components, unsafe-to-monitor components, critical components, and essential components that are subject to this rule and the reason(s) for such designation; except for pipes, the location of components subject to the rule (components may be grouped together functionally by process unit or facility description); except for pipes, components exempt pursuant to Section 4.8 (except for components buried below ground) may be described in the OMP by grouping them functionally by process unit or facility description (the results of any laboratory testing or other pertinent information to demonstrate compliance with the applicable exemption criteria for components for which an exemption is being claimed pursuant to Sections 4.8 shall be submitted with the OMP); a detailed schedule of an operator's inspections of components to be conducted as required by this rule and whether the operator inspections of components required by this rule will be performed by a qualified contractor or by an in-house team; a description of the training standards for personnel that inspect and repair components; and a description of the leak detection training for conducting the test method specified in Section 6.3.3 for new operators, and for experienced operators, as necessary. [District Rule 4401, 6.6]

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-1131-1036-12
B. Authority to Construct S-1131-1036-10
C. Emissions Increases
D. Application
E. Previous Title V Operating Permit S-1131-1036-9

ATTACHMENT A

Proposed Modified Title V Operating Permit
(S-1131-1036-12)

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1131-1036-12 **EXPIRATION DATE:** 02/28/2017

EQUIPMENT DESCRIPTION:
TEOR OPERATION WITH 885 THERMALLY ENHANCED WELLS WITH CLOSED CASING VENTS

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PERMIT UNIT REQUIREMENTS

1. When the number of wells in operation exceeds 485, before any ground disturbance activities on the project site, a qualified registered biologist shall conduct a focused survey to determine the presence/absence of potential impacts on sensitive species on-site and riparian habitat. The survey shall be conducted in accordance with the standard protocol of California Department of Fish & Game (CDFG) and/or California Department of Fish & Game (CDFG). Chevron U.S.A., Inc will notify CDFG and the US Fish and Wildlife Service (USFWS) in the event a State or Federally listed species is encountered. Results of the survey shall be made available for District inspection upon request. [Public Resources Code 21000-21177: California Environmental Quality Act]
2. When the number of wells in operation exceeds 485, before any ground disturbance activities on the project site, a qualified registered biologist shall conduct a focused survey to determine the presence/absence of potential impacts on the movement of any native resident or migratory fish or wildlife species, corridors, or nursery sites. Chevron U.S.A., Inc will notify California Department of Fish & Game and the US Fish and Wildlife Service in the event a State or Federally listed species is encountered. Results of the survey shall be made available for District inspection upon request. [Public Resources Code 21000-21177: California Environmental Quality Act]
3. When the number of wells in operation exceeds 485, Chevron U.S.A., Inc shall notify the US Fish and Wildlife Service (USFWS) and the California Department of Fish & Game (CDFG) immediately in the event that the Project avoidance measures fail and there is a take of a threatened or endangered species. No activities shall occur until Incidental Take authorization has been obtained from USFWS and CDFG. Documentation demonstrating authorization shall be made available for District inspection upon request. [Public Resources Code 21000-21177: California Environmental Quality Act]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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4. When the number of wells in operation exceeds 485, for Western Pond Turtle and American Badger: A qualified biological monitor will be present during project implementation. The biological monitor shall be notified immediately should the western pond turtle enter the project area and work shall be halted until there is no longer a potential to adversely impact the species. All vehicles and equipment entering the project area will be in good working condition and free from leaks. In the event that a vehicle or equipment item is found to be leaking fluid, operation of the vehicle or equipment item shall be terminated and it shall be repaired or replaced. If possible, repairs should be conducted in a contained area. All contaminated soil will be collected and properly disposed off the project site. To reduce the potential for direct and indirect impacts to American badger to a less-than-significant level, a qualified biologist will be retained prior to ground disturbing activities to conduct a pre-construction survey of the project area. The pre-construction survey would be conducted within the proposed project boundary and a buffer of 200 feet outside of the project footprint. If the preactivity survey indicates the presence of badger dens, they shall be classified as inactive, potentially active, or definitely active. (a) Inactive dens will be excavated by hand and backfilled to prevent reuse by badgers. (b) Potentially and definitely active dens will be monitored for three consecutive nights using a tracking medium (such as diatomaceous earth or fire clay) at the entrance. If no tracks or other sign are observed in the tracking medium at the conclusion of the three nights, the den will be excavated and backfilled by hand under the direction and supervision of a qualified biologist. If tracks are observed, the den will be progressively blocked with natural materials (dirt, sticks, and vegetation piled in front of the entrance) for the next three to five nights to discourage the badger from continued use. When a qualified biologist has determined that the den is no longer active, the den will be excavated and backfilled by hand to ensure that no badgers are trapped in the den. Results of the survey shall be made available for District inspection upon request. [Public Resources Code 21000-21177: California Environmental Quality Act]
5. When the number of wells in operation exceeds 485, Chevron U.S.A., Inc shall purchase sufficient credit from the Kern Water Bank Authority (KWBA) to mitigate for permanent and temporary habitat impacts. Documentation demonstrating the purchase shall be made available for District inspection upon request. [Public Resources Code 21000-21177: California Environmental Quality Act]
6. Total fugitive emission of volatile organic compounds (VOC) from entire operation shall not exceed 146.6 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Permittee shall maintain with the permit accurate fugitive component counts for well vent vapor control systems and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c(Feb 1999) Screening Range emission factors. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Fluids produced from these steam-enhanced wells with closed well casing vents shall be introduced only to tanks vented to a District approved vapor collection and control system, or to permit exempt storage equipment as defined by Rule 2020, Section 6.6 (Amended August 18, 2011). [District Rule 2201] Federally Enforceable Through Title V Permit
9. Well casing vents shall remain closed at all times except during periods of actual service or repair when wells are not producing. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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. [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
11. The inspection requirements of Section 5.4.1 through Section 5.4.7 of Rule 4401 shall not apply to components exclusively handling gas/vapor or liquid with a VOC content of ten percent by weight (10%) or less, as determined by the test methods in Section 6.3.4 of Rule 4401. [District Rule 4401, 4.7] Federally Enforceable Through Title V Permit
12. Gas and liquid leaks are as defined in Section 3.20 of Rule 4401. [District Rule 4401, 3.20] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

13. An operator shall not operate a steam-enhanced crude oil production well unless the operator complies with either of the following requirements: The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401, 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 the steam-enhanced crude oil production well vent is open and the well vent is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401, 5.1 and 5.1] Federally Enforceable Through Title V Permit
14. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the 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 as defined by Section 5.2.2.1 of Rule 4401 requiring process fluid flow through the open-ended lines, a component with a major liquid leak, or a component with a gas leak greater than 50,000 ppmv. [District Rule 4401, 5.2] Federally Enforceable Through Title V Permit
15. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of any combination of components with minor liquid leaks, minor gas leaks, or a gas leaks greater than 10,000 ppmv up to 50,000 ppmv that totals more than number of leaks allowed by Table 2 of Rule 4401. [District Rule 4401, 5.2] Federally Enforceable Through Title V Permit
16. An operator shall not use any component with a leak as defined in Section 3.0 of Rule 4401, or that is found to be in violation of the provisions of Section 5.2.2 of Rule 4401. However, components that were found leaking may be used provided such leaking components have been identified with a tag for repair, are repaired, or awaiting re-inspection after being repaired within the applicable time frame specified in Section 5.5 of Rule 4401. [District Rule 4401, 5.3] Federally Enforceable Through Title V Permit
17. Each hatch shall be 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, 5.3] Federally Enforceable Through Title V Permit
18. An operator shall comply with the requirements of Section 6.7 of Rule 4401 if there is any change in the description of major components or critical components. [District Rule 4401, 5.3] Federally Enforceable Through Title V Permit
19. Except for pipes and unsafe-to-monitor components, an operator shall inspect all other components pursuant to the requirements of Section 6.3.3 of Rule 4401 at least once every year. [District Rule 4401, 5.4] Federally Enforceable Through Title V Permit
20. An operator 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 this rule 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, 5.4] Federally Enforceable Through Title V Permit
21. In addition to the inspections required by Section 5.4.1 of Rule 4401, an operator shall inspect for leaks all accessible operating pumps, compressors, and PRDs in service as follows: An operator shall audio-visually (by hearing and by sight) inspect for leaks all accessible operating pumps, compressors, and PRDs in service at least once each calendar week. 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 this rule 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, 5.4] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

22. In addition to the inspections required by Sections 5.4.1, 5.4.2 and 5.4.3 of Rule 4401, operator shall perform the following: 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, re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection, inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. Except for PRDs subject to the requirements of Section 5.4.4.1 of Rule 4401, an operator 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, 5.4] Federally Enforceable Through Title V Permit
23. An operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401, 5.4] Federally Enforceable Through Title V Permit
24. District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. [District Rule 4401, 5.4] Federally Enforceable Through Title V Permit
25. An operator shall affix a readily visible weatherproof tag to a leaking component upon detection of the leak and shall include the following information on the tag: date and time of leak detection, date and time of leak measurement, for a gaseous leak, the leak concentration in ppmv, for a liquid leak, whether it is a major liquid leak or a minor liquid leak, whether the component is an essential component, an unsafe-to monitor component, or a critical component. [District Rule 4401, 5.5] Federally Enforceable Through Title V Permit
26. An operator shall keep the tag affixed to the component until an operator has met all of the following conditions: repaired or replaced the leaking component, re-inspected the component using the test method in Section 6.3.3, and the component is found to be in compliance with the requirements of this rule. [District Rule 4401 5.5] Federally Enforceable Through Title V Permit
27. An operator 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, 5.5] Federally Enforceable Through Title V Permit
28. Except for leaking critical components or leaking essential components subject to the requirements of Section 5.5.7 of Rule 4401, if an operator has minimized a leak but the leak still exceeds the applicable leak limits as defined in Section 3.0 of Rule 4401, an 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: Repair or replace the leaking component; or vent the leaking component to a VOC collection and control system as defined in Section 3.0 of Rule 4401, or remove the leaking component from operation. [District Rule 4401, 5.5] Federally Enforceable Through Title V Permit
29. The repair period in calendar days shall not exceed 14 days for minor gas leaks, 5 days for major gas leaks less than or equal to 50,000 ppmv, 2 days for gas leak greater than 50,000 ppmv, 3 days for minor liquid leaks, 2 days for major liquid leaks. [District Rule 4401, 5.5] Federally Enforceable Through Title V Permit
30. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period specified in Table 3 of Rule 4401. [District Rule 4401, 5.5] Federally Enforceable Through Title V Permit
31. The time of the initial leak detection shall be the start of the repair period specified in Table 3 of Rule 4401. [District Rule 4401, 5.5] Federally Enforceable Through Title V Permit
32. 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, 5.5] Federally Enforceable Through Title V Permit
33. The operator of any steam-enhanced crude oil production well shall maintain records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

34. An operator of any steam-enhanced crude oil production well shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit

35. The operator shall maintain an inspection log that has been signed and dated by the facility operator responsible for the inspection, certifying the accuracy of the information recorded in the log. The inspection log shall contain, at a minimum, all of the following information: 1) The total number of components inspected, and the total number and percentage of leaking components found by component types; 2) The location, type, name or description of each leaking component and the description of any unit where the leaking component is found; 3) Date of the leak detection and method of the leak detection; 4) For gaseous leaks, record 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 the leaking component(s); 6) The identification 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 first; 7) The method(s) 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. [District Rule 4401, 6.4] Federally Enforceable Through Title V Permit

36. Records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, instrument reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration shall be maintained. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit

37. An operator shall maintain copies at the facility of the training records of the training program operated pursuant to Section 6.5 of Rule 4401. [District Rule 4401 6.1] Federally Enforceable Through Title V Permit

38. The results of gauge tank TVP testing conducted pursuant to Section 6.2.3 shall be submitted to the APCO within 60 days after the completion of the testing. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit

39. An operator that discovers that a PRD has released shall record the date that the release was discovered, and the identity and location of the PRD that released. An operator shall submit such information recorded during the calendar year to the APCO no later than 60 days after the end of the calendar year. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit

40. An operator shall source test annually all vapor collection and control systems used to control emissions from steam-enhanced crude oil production well vents to determine the control efficiency of the device(s) used for destruction or removal of VOC. Compliance testing shall be performed annually by source testers certified by ARB. 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. A process system as defined in Section 3.30 of Rule 4401 is not subject to compliance source testing requirements. [District Rule 4401, 6.2] Federally Enforceable Through Title V Permit

41. If approved by EPA, ARB, and the APCO, an operator need not comply with the annual testing requirement of Section 6.2.1 if all uncondensed VOC emissions collected by a vapor collection are controlled by an internal combustion engine subject to Rule 4702, a combustion device subject to Rule 4320, 4307 or 4308, a flare subject to Rule 4311. [District Rule 4401, 6.2] Federally Enforceable Through Title V Permit

42. An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.0 of Rule 4401: Conduct periodic TVP testing of each gauge tank at least once every 24 months during summer (July - September), and whenever there is a change in the source or type of produced fluid in the gauge tank. The TVP testing shall be conducted at the actual storage temperature of the produced fluid in the gauge tank using the applicable TVP test method specified in Section 6.4 of Rule 4623 (Storage of Organic Liquids). The operator shall submit the TVP testing results to the APCO as specified in Section 6.1.9 of Rule 4401. [District Rule 4401, 6.2] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

43. 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, 6.3] Federally Enforceable Through Title V Permit

44. VOC content shall be analyzed by using the latest revision of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be performed by using ARB Method 432. [District Rule 4401, 6.3] Federally Enforceable Through Title V Permit

45. Leak inspection, other than audio-visual, and measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. 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 (1) centimeter or less from the surface of the component interface. [District Rule 4401, 6.3] Federally Enforceable Through Title V Permit

46. The 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, 6.3] Federally Enforceable Through Title V Permit

47. Operator shall maintain an inspection log in which an operator records, at a minimum, all of the following information for each inspection performed: The total number of components inspected, total number and percentage of leaking components found by component type, location, type, and name or description of each leaking component and description of any unit where the leaking component is found, date of leak detection and the method of leak detection. 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. the date of repair, replacement, or removal from operation of leaking components, 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, 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, the date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced, the inspector's name, business mailing address, and business telephone number, date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401, 6.4] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

48. The operator shall maintain an APCO approved Operator Management Plan (OMP). The OMP shall include, at a minimum, a description of all wells and all associated VOC collection and control systems subject to this rule, and all wells and all associated VOC collection and control systems that are exempt; an identification and description of any known hazard that might affect the safety of an inspector; except for pipes, the number of components that are subject to this rule by component type; except for pipes, the number and types of major components, inaccessible components, unsafe-to-monitor components, critical components, and essential components that are subject to this rule and the reason(s) for such designation; except for pipes, the location of components subject to the rule (components may be grouped together functionally by process unit or facility description); except for pipes, components exempt pursuant to Section 4.8 (except for components buried below ground) may be described in the OMP by grouping them functionally by process unit or facility description (the results of any laboratory testing or other pertinent information to demonstrate compliance with the applicable exemption criteria for components for which an exemption is being claimed pursuant to Sections 4.8 shall be submitted with the OMP); a detailed schedule of an operator's inspections of components to be conducted as required by this rule and whether the operator inspections of components required by this rule will be performed by a qualified contractor or by an in-house team; a description of the training standards for personnel that inspect and repair components; and a description of the leak detection training for conducting the test method specified in Section 6.3.3 for new operators, and for experienced operators, as necessary. [District Rule 4401, 6.6] Federally Enforceable Through Title V Permit

49. Operator shall keep a list of all gauge tanks, as defined in Section 3.0 of Rule 4401. The list shall contain the size, identification number, the location of each gauge tank and specify whether the gauge tank is upstream of all front line production equipment. [District Rule 4401, 6.1 and 6.6] Federally Enforceable Through Title V Permit

50. By January 30 of each year, an operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to an existing Operator Management Plan. [District Rule 4401, 6.7] Federally Enforceable Through Title V Permit

51. Records of wells constructed when wells in operation exceed 485 shall be maintained including location, construction start date and documentation required by California Environmental Quality Act conditions listed on this permit for a minimum of 5 years. [Public Resources Code 21000-21177: California Environmental Quality Act]

52. All records of required monitoring data and support information shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit

53. Formerly permit number S-1109-361-1.

DRAFT

ATTACHMENT B

Authority to Construct
(S-1131-1036-10)

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1131-1036-10 **ISSUANCE DATE:** 12/19/2011

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

LOCATION: HEAVY OIL CENTRAL
KERN COUNTY, CA

EQUIPMENT DESCRIPTION:
MODIFICATION OF TEOR OPERATION WITH 485 CYCLIC AND STEAM DRIVE WELLS WITH CLOSED CASING VENTS: ADD 400 WELLS TO WELL ROSTER, UPDATE EMISSION FACTORS BY USING CAPCOA SCREENING FACTORS, REVISE EQUIPMENT DESCRIPTION TO READ "885 THERMALLY ENHANCED WELLS WITH CLOSED CASING VENTS"

CONDITIONS

1. Construction related NOx emissions will be mitigated by surrendering Emission Reduction Credits (ERCs) for 0.96 tons of NOx emissions. ERCs must be surrendered to the District prior to any ground disturbance activities. [Public Resources Code 21000-21177: California Environmental Quality Act]
2. Operational related VOC emissions will be mitigated by surrendering Emission Reduction Credits (ERCs) for 17.03 tons of VOC emissions. ERCs must be surrendered to the District prior to any ground disturbance activities. [Public Resources Code 21000-21177: California Environmental Quality Act]
3. Before any ground disturbance activities on the project site, a qualified registered biologist shall conduct a focused survey to determine the presence/absence of potential impacts on sensitive species on-site and riparian habitat. The survey shall be conducted in accordance with the standard protocol of California Department of Fish & Game (CDFG) and/or California Department of Fish & Game (CDFG). Chevron U.S.A., Inc will notify CDFG and the US Fish and Wildlife Service (USFWS) in the event a State or Federally listed species is encountered. Results of the survey shall be made available for District inspection upon request. [Public Resources Code 21000-21177: California Environmental Quality Act]

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-1131-1036-10 : Sep 24 2012 4:42PM – RICKARDK : Joint Inspection NOT Required

4. Before any ground disturbance activities on the project site, a qualified registered biologist shall conduct a focused survey to determine the presence/absence of potential impacts on the movement of any native resident or migratory fish or wildlife species, corridors, or nursery sites. Chevron U.S.A., Inc will notify California Department of Fish & Game and the US Fish and Wildlife Service in the event a State or Federally listed species is encountered. Results of the survey shall be made available for District inspection upon request. [Public Resources Code 21000-21177: California Environmental Quality Act]

5. Chevron U.S.A., Inc to notify the US Fish and Wildlife Service (USFWS) and the California Department of Fish & Game (CDFG) immediately in the event that the Project avoidance measures fail and there is a take of a threatened or endangered species. No activities shall occur until Incidental Take authorization has been obtained from USFWS and CDFG. Documentation demonstrating authorization shall be made available for District inspection upon request. [Public Resources Code 21000-21177: California Environmental Quality Act]

6. For Western Pond Turtle and American Badger: A qualified biological monitor will be present during project implementation. The biological monitor shall be notified immediately should the western pond turtle enter the project area and work shall be halted until there is no longer a potential to adversely impact the species. All vehicles and equipment entering the project area will be in good working condition and free from leaks. In the event that a vehicle or equipment item is found to be leaking fluid, operation of the vehicle or equipment item shall be terminated and it shall be repaired or replaced. If possible, repairs should be conducted in a contained area. All contaminated soil will be collected and properly disposed off the project site. To reduce the potential for direct and indirect impacts to American badger to a less-than-significant level, a qualified biologist will be retained prior to ground disturbing activities to conduct a pre-construction survey of the project area. The pre-construction survey would be conducted within the proposed project boundary and a buffer of 200 feet outside of the project footprint. If the preactivity survey indicates the presence of badger dens, they shall be classified as inactive, potentially active, or definitely active. (a) Inactive dens will be excavated by hand and backfilled to prevent reuse by badgers. (b) Potentially and definitely active dens will be monitored for three consecutive nights using a tracking medium (such as diatomaceous earth or fire clay) at the entrance. If no tracks or other sign are observed in the tracking medium at the conclusion of the three nights, the den will be excavated and backfilled by hand under the direction and supervision of a qualified biologist. If tracks are observed, the den will be progressively blocked with natural materials (dirt, sticks, and vegetation piled in front of the entrance) for the next three to five nights to discourage the badger from continued use. When a qualified biologist has determined that the den is no longer active, the den will be excavated and backfilled by hand to ensure that no badgers are trapped in the den. Results of the survey shall be made available for District inspection upon request. [Public Resources Code 21000-21177: California Environmental Quality Act]

7. To purchase sufficient credit from the Kern Water Bank Authority (KWBA) to mitigate for permanent and temporary habitat impacts. Documentation demonstrating the purchase shall be made available for District inspection upon request. [Public Resources Code 21000-21177: California Environmental Quality Act]

8. 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

9. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 8,516 lb, 2nd quarter - 8,516 lb, 3rd quarter - 8,516 lb, and fourth quarter - 8,516 lb. The offset amounts listed above include the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201]

10. ERC Certificate Number S-2887-1 (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]

11. 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, 4.1] Federally Enforceable Through Title V Permit

12. All valves, fittings and connectors serving closed well vents shall be constructed and maintained in accordance with leak standards described in Rule 4401 except during periods of actual service and repair. [District Rules 2201 and 4401]

CONDITIONS CONTINUE ON NEXT PAGE

13. Wells authorized by this permit shall only be operated with closed casing vents. Well casing vents shall remain closed at all times except during periods of actual service or repair provided such activity is attended and done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere, and the front line production equipment downstream of the wells that carry produced fluids be connected to a VOC collection and control system. [District Rules 2201 and 4401]
14. Fluids produced from these steam-enhanced wells with closed well casing vents shall be introduced only to tanks vented to a District approved vapor collection and control system, or to permit exempt storage equipment as defined by Rule 2020, Section 6.6. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Total fugitive emission of volatile organic compounds (VOC) from entire operation shall not exceed 146.6 lb/day. [District Rule 2201]
16. Permittee shall maintain with the permit accurate fugitive component counts for well vent vapor control systems and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c(Feb 1999) Screening Range emission factors. [District Rule 2201]
17. The operator shall be in violation of Rule 4401 if any District inspection or if any operator inspection conducted pursuant to Rule 4401, Section 5.8 are found to be leaking in excess of the applicable leak standards in section 5.6.2. [District Rule 4401, 5.6.1]
18. There shall not be 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. [District Rule 4401, 5.6.2.1]
19. There shall be no components with major liquid leaks or with gas leaks greater than 50,000 ppmv. [District Rule 4401, 5.6.2.2 and 5.6.2.3]
20. There shall not be more minor liquid leaks, minor gas leaks, or gas leaks greater than 10,000 ppmv up to 50,000 ppmv than the following: 3 leaks for 1 - 25 wells, 6 leaks for 26 - 50 wells, 8 leaks for 51 - 100 wells, 10 leaks for 101 - 250 wells, 15 leaks for 251 - 500 wells, and 1 leak for each 20 wells (with a minimum of 50 wells test) for more than 500 wells connected to a VOC collection and control system. [District Rule 4401, 5.6.2.4]
21. 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, 5.7.1]
22. Except for pipes and unsafe-to-monitor components, all other components shall be inspected pursuant to the requirements of section 6.3.3 at least once every year. [District Rule 4401,5.8.1]
23. All pipes shall be visually inspected 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 this rule 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 as allowed by Rule 4401 and specified in this permit. [District Rule 4401, 5.8.2]
24. The operator shall inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. The operator shall inspect a component, other than PRDs, that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. The operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401, 5.8.4.2, 5.8.4.3, 5.8.5]
25. A District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. [District Rule 4401, 5.8.6]

CONDITIONS CONTINUE ON NEXT PAGE

26. The operator, upon detection of a leaking component, shall affix to that component a weatherproof, readily visible tag, bearing the date and time when the leak was detected and the date and time of the leak measurement. For gaseous leaks, the tag shall indicate the leak concentration in ppmv. For liquid leaks, the tag shall indicate whether it is a major liquid leak or a minor liquid leak. The tag shall indicate, when applicable, whether the component is an essential component, an unsafe-to-monitor component, or a critical component. The tag shall remain in place until the leaking component is repaired or replaced and reinspected and found to be in compliance with the requirements of this rule. [District Rule 4401 5.9.1, 5.9.2]

27. The operator shall minimize all component leaks immediately, to the extent possible, but not later than one hour after detection of the leak in order to stop or reduce leakage to the atmosphere. Except for leaking critical components or leaking essential components, if the leak has been minimized but the leak still exceeds the applicable leak standards specified in this permit, the operator shall do one of the following within the timeframes specified within this permit: 1) repair or replace the leaking component; 2) vent the leaking component to a closed vent system; 3) or remove the leaking component from operation. A closed vent system is a District approved system that is not open to the atmosphere. It 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 a District approved control device that has a overall VOC collection and destruction or removal efficiency of at least 99%, or that transports gases or vapors back to a process system. [District Rule 4401, 5.9.4]

28. The operator shall repair minor gas leaks within 14 days, major gas leaks which less than or equal to 50,000 ppmv within 5 days., major gas leaks which are greater than 50,000 ppmv within two days, minor liquid leaks within 3 days, and major liquid leaks within 2 days. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period. The start of the repair period shall be the time of the initial leak detection. [District Rule 4401, 5.9.4, 5.9.5, and 5.9.6]

29. If a leaking component is an essential component or a critical component which cannot be shut down immediately for repairs, and after being minimized still exceeds the applicable leak standard, the operator shall repair or replace the component to eliminate the leak during the next process unit turnaround or no later than one year from the date of original leak detection, which ever is earlier. [District Rule 4401, 5.9.7]

30. The operator of any steam-enhanced crude oil production well shall maintain records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401, 6.1.1]

31. An operator of any steam-enhanced crude oil production well shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system. [District Rule 4401, 6.1.3]

32. 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 44019, 6.1.6]

33. Leak inspection, other than audio-visual, and measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. 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 (1) centimeter or less from the surface of the component interface. [District Rule 4401, 6.3.3]

34. The 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, 6.3.5]

CONDITIONS CONTINUE ON NEXT PAGE

35. The operator shall maintain an inspection log that has been signed and dated by the facility operator responsible for the inspection, certifying the accuracy of the information recorded in the log. The inspection log shall contain, at a minimum, all of the following information: 1) The total number of components inspected, and the total number and percentage of leaking components found by component types; 2) The location, type, name or description of each leaking component and the description of any unit where the leaking component is found; 3) Date of the leak detection and method of the leak detection; 4) For gaseous leaks, record 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 the leaking component(s); 6) The identification 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 first; 7) The method(s) 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. [District Rule 4401, 6.4]

36. The operator shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures, as necessary. [District Rule 4401, 6.5]

37. The operator shall maintain copies of training records and a copy of the latest APCO-approved Operator Management Plan (OMP) at the facility and make such available to the APCO, ARB, and US EPA upon request. [District Rule 4401, 6.1.7, 6.1.8]

38. The operator shall maintain an APCO approved Operator Management Plan (OMP). The OMP shall include, at a minimum, a description of all wells and all associated VOC collection and control systems subject to this rule, and all wells and all associated VOC collection and control systems that are exempt; an identification and description of any known hazard that might affect the safety of an inspector; except for pipes, the number of components that are subject to this rule by component type; except for pipes, the number and types of major components, inaccessible components, unsafe-to-monitor components, critical components, and essential components that are subject to this rule and the reason(s) for such designation; except for pipes, the location of components subject to the rule (components may be grouped together functionally by process unit or facility description); except for pipes, components exempt pursuant to Section 4.8 (except for components buried below ground) may be described in the OMP by grouping them functionally by process unit or facility description (the results of any laboratory testing or other pertinent information to demonstrate compliance with the applicable exemption criteria for components for which an exemption is being claimed pursuant to Sections 4.8 shall be submitted with the OMP); a detailed schedule of an operator's inspections of components to be conducted as required by this rule and whether the operator inspections of components required by this rule will be performed by a qualified contractor or by an in-house team; a description of the training standards for personnel that inspect and repair components; and a description of the leak detection training for conducting the test method specified in Section 6.3.3 for new operators, and for experienced operators, as necessary. [District Rule 4401, 6.6]

39. By January 30th of each year the operator shall submit to the District for approval, in writing, an annual report indicating any changes to the existing OMP on file at the District. [District Rule 4401, 6.7]

40. Permittee shall maintain with the permit a listing (updated annually within 60 day of permit anniversary) of all steam-enhanced wells authorized by this permit and such listing shall be made available for District inspection upon request. [District Rules 2201 and 1070]

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
S-1131-1036	0	0	0	0	0
TOTAL	**0**	**0**	**0**	**0**	**0**

ATTACHMENT D

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

RECEIVED
APR 23 2012
SJVAPCD
Southern Region

Permit Application For:

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

1. PERMIT TO BE ISSUED TO: **CHEVRON U.S.A. INC.**

2. MAILING ADDRESS:

STREET/P.O. BOX: **PO BOX 1392**

CITY: **BAKERSFIELD** STATE: **CA** 9-DIGIT ZIP CODE: **93302**

3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:

STREET: **Heavy Oil Central Source – KR Oilfield** CITY:

¼ SECTION TOWNSHIP RANGE

INSTALLATION DATE:

4. GENERAL NATURE OF BUSINESS:

CRUDE OIL AND GAS PRODUCTION

5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)

Implementation of ATC S-1131-1036-10 Increase Number of Wells to 885

6. TYPE OR PRINT NAME OF APPLICANT: **Jason H. Donchin**

TITLE OF APPLICANT: **HES Manager**

7. SIGNATURE OF APPLICANT: Mark Lindy /fr DATE: 4/23/2012

PHONE: (661) 654-7141
FAX: (661) 654-7606
EMAIL: landilr@chevron.com

For APCD Use Only:

NOF

DATE STAMP	*FILING FEE RECEIVED :* $ *CHECK#:*
	DATE PAID:
	PROJECT NO: S-1121314 *FACILITY ID:* S-1131

TV MM

RECEIVED
APR 23 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
[X] MINOR PERMIT MODIFICATION
[ ] ADMINISTRATIVE AMENDMENT

COMPANY NAME: **CHEVRON U.S.A. INC.**	FACILITY ID: **S-1131**
1. Type of Organization: [X] Corporation [ ] Sole Ownership [ ] Government [ ] Partnership [ ] Utility	
2. Owner's Name: **CHEVRON U.S.A. INC.**	
3. Agent to the Owner: **N/A**	

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

(AA) 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).

(AA) 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.

(AA) Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

(AA) 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

4/16/12
Date

Gary Piron
Name of Responsible Official (please print)

Operations Manager
Title of Responsible Official (please print)

ATC S-1131-1036-10 – Increase Number of Wells to 855

ATTACHMENT E

Previous Title V Operating Permit
(S-1131-1036-9)

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1131-1036-9 **EXPIRATION DATE:** 02/28/2017

EQUIPMENT DESCRIPTION:
TEOR OPERATION WITH 485 CYCLIC AND STEAM DRIVE WELLS WITH CLOSED CASING VENTS

PERMIT UNIT REQUIREMENTS

1. Emissions from each closed casing vent well covered by this permit shall not exceed 0.0216 lb VOC/hr-well for components and 0.0194 lb VOC/hr-well for polished rod stuffing boxes. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Fluids produced from these steam-enhanced wells with closed well casing vents shall be introduced only to tanks vented to a District approved vapor collection and control system, or to permit exempt storage equipment as defined by Rule 2020, Section 6.6 (Amended August 18, 2011. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Well casing vents shall remain closed at all times except during periods of actual service or repair when wells are not producing. [District Rule 2201] Federally Enforceable Through Title V Permit
4. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the emission control requirements of District Rule 4401. [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
5. The inspection requirements of Section 5.4.1 through Section 5.4.7 of Rule 4401 shall not apply to components exclusively handling gas/vapor or liquid with a VOC content of ten percent by weight (10%) or less, as determined by the test methods in Section 6.3.4 of Rule 4401. [District Rule 4401, 4.7] Federally Enforceable Through Title V Permit
6. Gas and liquid leaks are as defined in Section 3.20 of Rule 4401. [District Rule 4401, 3.20] Federally Enforceable Through Title V Permit
7. An operator shall not operate a steam-enhanced crude oil production well unless the operator complies with either of the following requirements: The steam-enhanced crude oil production well vent is closed and the front line production equipment downstream of the wells that carry produced fluids (crude oil or mixture of crude oil and water) is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401, 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 the steam-enhanced crude oil production well vent is open and the well vent is connected to a VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401, 5.1 and 5.1] Federally Enforceable Through Title V Permit
8. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the 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 as defined by Section 5.2.2.1 of Rule 4401 requiring process fluid flow through the open-ended lines, a component with a major liquid leak, or a component with a gas leak greater than 50,000 ppmv. [District Rule 4401, 5.2] Federally Enforceable Through Title V Permit

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9. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.4 of Rule 4401 demonstrates the existence of any combination of components with minor liquid leaks, minor gas leaks, or a gas leaks greater than 10,000 ppmv up to 50,000 ppmv that totals more than number of leaks allowed by Table 2 of Rule 4401. [District Rule 4401, 5.2] Federally Enforceable Through Title V Permit

10. An operator shall not use any component with a leak as defined in Section 3.0 of Rule 4401, or that is found to be in violation of the provisions of Section 5.2.2 of Rule 4401. However, components that were found leaking may be used provided such leaking components have been identified with a tag for repair, are repaired, or awaiting re-inspection after being repaired within the applicable time frame specified in Section 5.5 of Rule 4401. [District Rule 4401, 5.3] Federally Enforceable Through Title V Permit

11. Each hatch shall be 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, 5.3] Federally Enforceable Through Title V Permit

12. An operator shall comply with the requirements of Section 6.7 of Rule 4401 if there is any change in the description of major components or critical components. [District Rule 4401, 5.3] Federally Enforceable Through Title V Permit

13. Except for pipes and unsafe-to-monitor components, an operator shall inspect all other components pursuant to the requirements of Section 6.3.3 of Rule 4401 at least once every year. [District Rule 4401, 5.4] Federally Enforceable Through Title V Permit

14. An operator 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 this rule 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, 5.4] Federally Enforceable Through Title V Permit

15. In addition to the inspections required by Section 5.4.1 of Rule 4401, an operator shall inspect for leaks all accessible operating pumps, compressors, and PRDs in service as follows: An operator shall audio-visually (by hearing and by sight) inspect for leaks all accessible operating pumps, compressors, and PRDs in service at least once each calendar week. 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 this rule 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, 5.4] Federally Enforceable Through Title V Permit

16. In addition to the inspections required by Sections 5.4.1, 5.4.2 and 5.4.3 of Rule 4401, operator shall perform the following: 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, re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection, inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. Except for PRDs subject to the requirements of Section 5.4.4.1 of Rule 4401, an operator 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, 5.4] Federally Enforceable Through Title V Permit

17. An operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401, 5.4] Federally Enforceable Through Title V Permit

18. District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. [District Rule 4401, 5.4] Federally Enforceable Through Title V Permit

19. An operator shall affix a readily visible weatherproof tag to a leaking component upon detection of the leak and shall include the following information on the tag: date and time of leak detection, date and time of leak measurement, for a gaseous leak, the leak concentration in ppmv, for a liquid leak, whether it is a major liquid leak or a minor liquid leak, whether the component is an essential component, an unsafe-to monitor component, or a critical component. [District Rule 4401, 5.5] Federally Enforceable Through Title V Permit

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20. An operator shall keep the tag affixed to the component until an operator has met all of the following conditions: repaired or replaced the leaking component, re-inspected the component using the test method in Section 6.3.3, and the component is found to be in compliance with the requirements of this rule. [District Rule 4401 5.5] Federally Enforceable Through Title V Permit

21. An operator 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, 5.5] Federally Enforceable Through Title V Permit

22. Except for leaking critical components or leaking essential components subject to the requirements of Section 5.5.7 of Rule 4401, if an operator has minimized a leak but the leak still exceeds the applicable leak limits as defined in Section 3.0 of Rule 4401, an 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: Repair or replace the leaking component; or vent the leaking component to a VOC collection and control system as defined in Section 3.0 of Rule 4401, or remove the leaking component from operation. [District Rule 4401, 5.5] Federally Enforceable Through Title V Permit

23. The repair period in calendar days shall not exceed 14 days for minor gas leaks, 5 days for major gas leaks less than or equal to 50,000 ppmv, 2 days for gas leak greater than 50,000 ppmv, 3 days for minor liquid leaks, 2 days for major liquid leaks. [District Rule 4401, 5.5] Federally Enforceable Through Title V Permit

24. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period specified in Table 3 of Rule 4401. [District Rule 4401, 5.5] Federally Enforceable Through Title V Permit

25. The time of the initial leak detection shall be the start of the repair period specified in Table 3 of Rule 4401. [District Rule 4401, 5.5] Federally Enforceable Through Title V Permit

26. 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, 5.5] Federally Enforceable Through Title V Permit

27. The operator of any steam-enhanced crude oil production well shall maintain records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit

28. An operator of any steam-enhanced crude oil production well shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system as defined in Section 3.0 of Rule 4401. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit

29. Operator of any steam-enhanced crude oil production well shall keep an inspection log maintained pursuant to Section 6.4 of Rule 4401. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit

30. Records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, instrument reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration shall be maintained. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit

31. An operator shall maintain copies at the facility of the training records of the training program operated pursuant to Section 6.5 of Rule 4401. [District Rule 4401 6.1] Federally Enforceable Through Title V Permit

32. The results of gauge tank TVP testing conducted pursuant to Section 6.2.3 shall be submitted to the APCO within 60 days after the completion of the testing. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit

33. An operator that discovers that a PRD has released shall record the date that the release was discovered, and the identity and location of the PRD that released. An operator shall submit such information recorded during the calendar year to the APCO no later than 60 days after the end of the calendar year. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit

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34. An operator shall source test annually all vapor collection and control systems used to control emissions from steam-enhanced crude oil production well vents to determine the control efficiency of the device(s) used for destruction or removal of VOC. Compliance testing shall be performed annually by source testers certified by ARB. 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. A process system as defined in Section 3.30 of Rule 4401 is not subject to compliance source testing requirements. [District Rule 4401, 6.2] Federally Enforceable Through Title V Permit

35. If approved by EPA, ARB, and the APCO, an operator need not comply with the annual testing requirement of Section 6.2.1 if all uncondensed VOC emissions collected by a vapor collection are controlled by an internal combustion engine subject to Rule 4702, a combustion device subject to Rule 4320, 4307 or 4308, a flare subject to Rule 4311. [District Rule 4401, 6.2] Federally Enforceable Through Title V Permit

36. An operator shall comply with the following requirements for each gauge tank, as defined in Section 3.0 of Rule 4401: Conduct periodic TVP testing of each gauge tank at least once every 24 months during summer (July - September), and whenever there is a change in the source or type of produced fluid in the gauge tank. The TVP testing shall be conducted at the actual storage temperature of the produced fluid in the gauge tank using the applicable TVP test method specified in Section 6.4 of Rule 4623 (Storage of Organic Liquids). The operator shall submit the TVP testing results to the APCO as specified in Section 6.1.9 of Rule 4401. [District Rule 4401, 6.2] Federally Enforceable Through Title V Permit

37. 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, 6.3] Federally Enforceable Through Title V Permit

38. VOC content shall be analyzed by using the latest revision of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be performed by using ARB Method 432. [District Rule 4401, 6.3] Federally Enforceable Through Title V Permit

39. Leak inspection, other than audio-visual, and measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. 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 (1) centimeter or less from the surface of the component interface. [District Rule 4401, 6.3] Federally Enforceable Through Title V Permit

40. The 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, 6.3] Federally Enforceable Through Title V Permit

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41. Operator shall maintain an inspection log in which an operator records, at a minimum, all of the following information for each inspection performed: The total number of components inspected, total number and percentage of leaking components found by component type, location, type, and name or description of each leaking component and description of any unit where the leaking component is found, date of leak detection and the method of leak detection. 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. the date of repair, replacement, or removal from operation of leaking components, 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, 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, the date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced, the inspector's name, business mailing address, and business telephone number, date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401, 6.4] Federally Enforceable Through Title V Permit
42. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401, 6.1 and 6.5] Federally Enforceable Through Title V Permit
43. Operator shall keep a list of all gauge tanks, as defined in Section 3.0 of Rule 4401. The list shall contain the size, identification number, the location of each gauge tank and specify whether the gauge tank is upstream of all front line production equipment. [District Rule 4401, 6.1 and 6.6] Federally Enforceable Through Title V Permit
44. By January 30 of each year, an operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to an existing Operator Management Plan. [District Rule 4401, 6.7] Federally Enforceable Through Title V Permit
45. All records of required monitoring data and support information shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit
46. Formerly permit number S-1109-361-1.