



APR 11 2014

Mr. Jack Jones
ExxonMobil Production Company
18271 Hwy 33
McKittrick, CA 93251-9737

**Re: Notice of Minor Title V Permit Modification
District Facility # S-1328
Project # 1141364**

Dear Mr. Jones:

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-1328-7-15 into the Title V operating permit. The project authorized clarification of Specific Limiting Conditions (SLCs) to eliminate redundancy.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-1328-7-15, 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,


Arnaud Marjollet
Director of Permit Services

Enclosures

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
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Central Region (Main Office)
1990 E. Gettysburg Avenue
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Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
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TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1141364

Engineer: Richard Edgehill
Date: April 9, 2014

Facility Number: S-1328
Facility Name: ExxonMobil
Mailing Address: 18271 Hwy 33
McKittrick, CA 93251

Reviewed by ASUPP ADE

APR 10 2014

Contact Name: Jack Jones
Phone: (661) 762-7383
Title: Sr Field Superintendent
Lead Engineer: Richard Karrs
Responsible Official: Jack Jones

I. PROPOSAL

ExxonMobil is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct S-1328-7-15 into the Title V operating permit. The project authorized clarification of Condition #22 (with additional underlined words) and revision (deletion of words) of Condition #5 of PTO S-1328-7-14. These changes, which are listed below, eliminated redundancy.

22. The permittee shall maintain records of fuel type, quantity, heating value of gas burned, permitted emission factors and annual combustion emissions from units S-1328-1, '-2, '-3, and flare identified on S-1328-7 for demonstration of compliance with above SLC annual limits. Records shall be updated at least monthly. Reports of annual emissions and fuel usage shall be submitted within 30 days after the end of the calendar year. [District Rule 2201] Y*
- *underlined words added in this project for clarity
- 5: Noncondensable vapor gas throughput to flare shall not exceed ~~0.333 MMscf per day if two (2) or three (3) steam generators are in operation, 0.666 MMscf if one (1) steam generator is in operation, and 1.0 MMscf per day if none of the steam generators is in operation.~~ [District Rule 2201]

The SLC annual limits, which are referred to in Condition #22, are stated in the following condition:

11. Combined annual combustion emissions from units S-1328-1, -2, -3 and the flare identified on S-1328-7 shall not exceed any of the following: NOx (as NO2): 25,733 lb/yr, SOx (as SO2): 41,975 lb/yr, PM10: 7,154 lb/yr, CO: 22,849 lb/yr, or VOC: 4,271 lb/yr. [District Rule 2201] Y

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 permit unit is located at the Hill Lease in the South Belridge Oil Field, within the ExxonMobil's Heavy Oil Western Stationary Source, NE 1/4, NW 1/4, and SW 1/4 Section 19, Township 28S, Range 21E. The facility address is 18271 Hwy 33, McKittrick, CA 93251.

III. EQUIPMENT DESCRIPTION

PTO S-1328-7-17: THERMALLY ENHANCED OIL RECOVERY OPERATION SERVING 171 STEAM DRIVE WELLS WITH VAPOR CONTROL SYSTEM, INCLUDING PERMIT EXEMPT HEATER TREATER (FORMERLY S-1328-56) OFF-GAS, GAS/LIQUID SEPARATOR, COMPRESSOR, CONDENSERS, TWO H₂S SCRUBBING VESSELS, FLARE, AND ASSOCIATED PIPING

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

A condition match between draft PTO and current PTO is provided below.

Draft PTO S-1328-7-17	Current PTO S-1328-7-14	Comments
1-4	1-4	
5	5	Revised SLC condition as described above...
6-21	6-21	
22	22	Revised record-keeping condition as described above.
23-67	23-67	

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

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5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

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

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

VIII. ATTACHMENTS

- A. Proposed Title V PTO S-1328-7-17
- B. Authority to Construct S-1328-7-15
- C. Permit Application
- D. Current Title V PTO S-1328-7-14

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ATTACHMENT A

Proposed Title V PTO
S-1328-7-17

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1328-7-17

EXPIRATION DATE: 03/31/2016

SECTION: NE19 **TOWNSHIP:** 28S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

THERMALLY ENHANCED OIL RECOVERY OPERATION SERVING 171 STEAM DRIVE WELLS WITH VAPOR CONTROL SYSTEM, INCLUDING PERMIT EXEMPT HEATER TREATER (FORMERLY S-1328-56) OFF-GAS, GAS/LIQUID SEPARATOR, COMPRESSOR, CONDENSERS, TWO H₂S SCRUBBING VESSELS, FLARE, AND ASSOCIATED PIPING

PERMIT UNIT REQUIREMENTS

1. Permittee shall maintain a current list of all steam enhanced wells, including identification of all steam enhanced wells with polish rod boxes subject to BACT I&M program connected to this system, and shall update the list whenever a well is added, replaced or deleted. The updated list shall be submitted to the District 60 days prior to the permit anniversary. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Vapor control system shall serve thermally enhanced well vents, permit exempt heater treaters, and Wemco S-1328-58. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Scrubbing solution shall consist only of Sulfa-Check and/or Sulfa-Treat media and additives unless prior District approval is obtained. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Noncondensable vapor gas from this well vent vapor control system may be incinerated in the following devices: steam generator permits S-1328-1, S-1328-2, and S-1328-3, and the standby flare. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Noncondensable vapor gas throughput to flare shall not exceed 1.0 MMscf per day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Permittee shall maintain accurate component count and emissions calculated using CAPCOA EPA Protocol for Leak Emissions Estimate Fugitive Hydrocarbon Leaks Oil and Gas Production Operations Average Emission Factors, Table 2-4, February 1999. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive VOC emission rate from TEOR components shall not exceed 184.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. VOC content of gas processed shall not exceed 31% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of five years. [District Rule 1070 and District Rule 2201] Federally Enforceable Through Title V Permit
9. Emission rates from the standby flare shall not exceed any of the following: NO_x (as NO₂): 0.0725 lb/MMBtu, SO_x (as SO₂): 115.0 lb/day, PM₁₀: 0.0202 lb/MMBtu, CO: 0.022 lb/MMBtu, or VOC: 0.0021 lb/MMBtu. [District Rules 2201, 4201, 4301 and 4801] Federally Enforceable Through Title V Permit
10. SO_x (as SO₂) = $(1.68 \times 10E-7) \times \{(P1 \times F1) + (P2 \times F2)\}$ = lb/day: P1 = ppmv H₂S in sweet gas, P2 = ppmv H₂S in noncondensable vapor gas, F1 = sweet gas (scf/day), and F2 = noncondensable vapor gas (scf/day). [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.

11. Combined annual combustion emissions from units S-1328-1, -2, -3 and the flare identified on S-1328-7 shall not exceed any of the following: NO_x (as NO₂): 25,733 lb/yr, SO_x (as SO₂): 41,975 lb/yr, PM₁₀: 7,154 lb/yr, CO: 22,849 lb/yr, or VOC: 4,271 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
12. If fuel use monitoring provisions fail, emissions shall be calculated based on operational data, or if not available, on set equal to the average of four days prior to failure. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall apply to revise each Permit to Operate subject to the SLC when any unit subject to the SLC has a District-authorized change in daily emission rate, or Permit to Operate is surrendered or sold. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Standby flare shall comply with all requirements of District Rule 4311. [District Rule 4311] Federally Enforceable Through Title V Permit
15. The flame shall be present at all times when combustible gases are vented through the flare. [District Rule 4311, 5.2] Federally Enforceable Through Title V Permit
16. The outlet shall be equipped with an automatic ignition system, or, shall operate with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rule 4311, 5.3] Federally Enforceable Through Title V Permit
17. Except for flares equipped with a flow-sensing ignition system, a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present shall be installed and operated. [District Rule 4311, 5.4] Federally Enforceable Through Title V Permit
18. {2332} Flares that use flow-sensing automatic ignition systems and which do not use a continuous flame pilot shall use purge gas for purging. [District Rule 4311, 5.5] Federally Enforceable Through Title V Permit
19. Open flares (air-assisted, steam-assisted, or non-assisted) in which the flare gas pressure is less than 5 psig shall be operated in such a manner that meets the provisions of 40 CFR 60.18. [District Rule 4311, 5.6] Federally Enforceable Through Title V Permit
20. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
21. Permittee shall sample sweet and noncondensable vapor gas monthly for H₂S concentration and shall maintain daily records of sweet & noncondensable vapor gas flowrate (scfd). [District Rule 2201] Federally Enforceable Through Title V Permit
22. The permittee shall maintain records of fuel type, quantity, heating value of gas burned, permitted emission factors and annual combustion emissions from units S-1328-1, '-2, '-3, and flare identified on S-1328-7 for demonstration of compliance with above SLC annual limits. Records shall be updated at least monthly. Reports of annual emissions and fuel usage shall be submitted within 30 days after the end of the calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Permittee shall measure H₂S concentration from on-line scrubber(s) outlet with District-approved device (e.g. MSA Samplair pump unit No. 463998 and MSA H₂S detector tubes) at least daily when scrubber is in operation. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
24. Permittee shall measure daily the non-condensibles gas flow rate and, at least monthly, the non-condensable gas H₂S concentration. Records shall be maintained and made readily available for District inspection upon request. [District Rule 1070]
25. Permittee shall maintain accurate daily records of volume noncondensable gas incinerated in flare. [District Rule 1070]
26. 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
27. Any steam-enhanced crude oil production well undergoing service or repair during the time the well is not producing shall be exempt from the requirements of Rule 4401. [District Rule 4401, 4.1] 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.

28. The requirements of this rule shall not apply to components serving the produced fluid line. [District Rule 4401, 4.5] Federally Enforceable Through Title V Permit
29. Except for complying with the applicable requirements of Section 6.1, Section 6.6.6 and Section 7.2, the requirements of this rule shall not apply to components described in Section 4.6.1 through Section 4.6.4. An operator claiming an exemption pursuant to Section 4.6 shall provide proof of the applicable criteria to the satisfaction of the APCO. [District Rule 4401, 4.6] Federally Enforceable Through Title V Permit
30. 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, 5.1.1 and 5.1.2] Federally Enforceable Through Title V Permit
31. 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, 5.2.2] Federally Enforceable Through Title V Permit
32. 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, 5.2.2] Federally Enforceable Through Title V Permit
33. 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, 5.3.1] Federally Enforceable Through Title V Permit
34. 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, 5.3.2] Federally Enforceable Through Title V Permit
35. 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, 5.3.3] Federally Enforceable Through Title V Permit
36. Unless exempt under Section 4.7 or Rule 4401, 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, 5.4.1] Federally Enforceable Through Title V Permit
37. Unless exempt under Section 4.7 or Rule 4401, 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, 5.4.2] 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.

38. Unless exempt under Section 4.7 or Rule 4401, 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, 5.4.3] Federally Enforceable Through Title V Permit
39. Unless exempt under Section 4.7 or Rule 4401, 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, 5.4.4] Federally Enforceable Through Title V Permit
40. Unless exempt under Section 4.7 or Rule 4401, an operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401, 5.4.5] Federally Enforceable Through Title V Permit
41. 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, 5.4.6] Federally Enforceable Through Title V Permit
42. 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, 5.5.1] Federally Enforceable Through Title V Permit
43. 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 5.5.2] Federally Enforceable Through Title V Permit
44. 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, 5.5.3] Federally Enforceable Through Title V Permit
45. 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, 5.5.4] Federally Enforceable Through Title V Permit
46. 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, 5.5.4] Federally Enforceable Through Title V Permit
47. 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, 5.5.5] Federally Enforceable Through Title V Permit
48. 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, 5.5.6] 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.

49. 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, 5.5.7] Federally Enforceable Through Title V Permit
50. 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
51. 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] Federally Enforceable Through Title V Permit
52. 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, 6.1.5] Federally Enforceable Through Title V Permit
53. 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, 6.1.6] Federally Enforceable Through Title V Permit
54. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401, 6.1.7] Federally Enforceable Through Title V Permit
55. 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, 6.1.10] Federally Enforceable Through Title V Permit
56. If approved by the APCO, an operator need not comply with the annual testing requirement of Section 6.2.1 of Rule 4401 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, 6.2.2] Federally Enforceable Through Title V Permit
57. 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, 6.3.1] Federally Enforceable Through Title V Permit
58. 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, 6.3.2] Federally Enforceable Through Title V Permit
59. 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] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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60. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval for TEOR gas, 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, 6.3.4] Federally Enforceable Through Title V Permit
61. Operator shall maintain an inspection log pursuant to Section 6.4 of Rule 4401, including, 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, 6.1.4 and 6.4] Federally Enforceable Through Title V Permit
62. Permittee shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures, as necessary. [District Rule 4401, 6.5] Federally Enforceable Through Title V Permit
63. In accordance with the approved Operator Management Plan (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, 6.6] Federally Enforceable Through Title V Permit
64. 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, 6.7] Federally Enforceable Through Title V Permit
65. {2457} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following requirements: County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
66. {2458} Compliance with permit conditions in the Title V permit shall be deemed in compliance with District Rule 4401 (Amended January 15, 1998), excluding sections 5.1 and 5.2 for control systems which have been waived from complying with the requirement of section 6.2.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
67. {2459} The requirements of District Rule 4407 (Adopted May 19, 1994) do not apply to this permit unit because it is not an in situ combustion well vent. A permit shield is granted from this requirement. [District Rule 2520, 13.2] 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-1328-7-15

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1328-7-15

ISSUANCE DATE: 03/12/2014

LEGAL OWNER OR OPERATOR: EXXON MOBIL CORPORATION

MAILING ADDRESS: P.O. BOX 4358
CORP-WGR-1030
HOUSTON, TX 77210-4358

LOCATION: HEAVY OIL WESTERN STATIONARY SOURCE
CA

SECTION: NE19 TOWNSHIP: 28S RANGE: 21E

EQUIPMENT DESCRIPTION:

MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY OPERATION SERVING 171 STEAM DRIVE WELLS WITH VAPOR CONTROL SYSTEM, INCLUDING PERMIT EXEMPT HEATER TREATER (FORMERLY S-1328-56) OFF-GAS, GAS/LIQUID SEPARATOR, COMPRESSOR, CONDENSERS, TWO H₂S SCRUBBING VESSELS, FLARE, AND ASSOCIATED PIPING: REVISE SLC CONDITION

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. Permittee shall maintain a current list of all steam enhanced wells, including identification of all steam enhanced wells with polish rod boxes subject to BACT I&M program connected to this system, and shall update the list whenever a well is added, replaced or deleted. The updated list shall be submitted to the District 60 days prior to the permit anniversary. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Vapor control system shall serve thermally enhanced well vents, permit exempt heater treater, and Wemco S-1328-58. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Scrubbing solution shall consist only of Sulfa-Check and/or Sulfa-Treat media and additives unless prior District approval is obtained. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Noncondensable vapor gas from this well vent vapor control system may be incinerated in the following devices: steam generator permits S-1328-1, S-1328-2, and S-1328-3, and the standby flare. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

ARNAUD MARJOLLET, Director of Permit Services

S-1328-7-15 - Apr 8 2014 11:29AM - EDGEHILL : Joint Inspection NOT Required

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

6. Noncondensable vapor gas throughput to flare shall not exceed 1.0 MMscf per day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Permittee shall maintain accurate component count and emissions calculated using CAPCOA EPA Protocol for Leak Emissions Estimate Fugitive Hydrocarbon Leaks Oil and Gas Production Operations Average Emission Factors, Table 2-4, February 1999. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Fugitive VOC emission rate from TEOR components shall not exceed 184.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. VOC content of gas processed shall not exceed 31% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of five years. [District Rule 1070 and District Rule 2201] Federally Enforceable Through Title V Permit
10. Emission rates from the standby flare shall not exceed any of the following: NO_x (as NO₂): 0.0725 lb/MMBtu, SO_x (as SO₂): 115.0 lb/day, PM₁₀: 0.0202 lb/MMBtu, CO: 0.022 lb/MMBtu, or VOC: 0.0021 lb/MMBtu. [District Rules 2201, 4201, 4301 and 4801] Federally Enforceable Through Title V Permit
11. $SO_x \text{ (as } SO_2) = (1.68 \times 10E-7) \times \{(P1 \times F1) + (P2 \times F2)\} = \text{lb/day}$: P1 = ppmv H₂S in sweet gas, P2 = ppmv H₂S in noncondensable vapor gas, F1 = sweet gas (scf/day), and F2 = noncondensable vapor gas (scf/day). [District Rule 2201] Federally Enforceable Through Title V Permit
12. Combined annual combustion emissions from units S-1328-1, -2, -3 and the flare identified on S-1328-7 shall not exceed any of the following: NO_x (as NO₂): 25,733 lb/yr, SO_x (as SO₂): 41,975 lb/yr, PM₁₀: 7,154 lb/yr, CO: 22,849 lb/yr, or VOC: 4,271 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
13. If fuel use monitoring provisions fail, emissions shall be calculated based on operational data, or if not available, on set equal to the average of four days prior to failure. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The operator shall apply to revise each Permit to Operate subject to the SLC when any unit subject to the SLC has a District-authorized change in daily emission rate, or Permit to Operate is surrendered or sold. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Standby flare shall comply with all requirements of District Rule 4311. [District Rule 4311] Federally Enforceable Through Title V Permit
16. The flame shall be present at all times when combustible gases are vented through the flare. [District Rule 4311, 5.2] Federally Enforceable Through Title V Permit
17. The outlet shall be equipped with an automatic ignition system, or, shall operate with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rule 4311, 5.3] Federally Enforceable Through Title V Permit
18. Except for flares equipped with a flow-sensing ignition system, a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present shall be installed and operated. [District Rule 4311, 5.4] Federally Enforceable Through Title V Permit
19. Flares that use flow-sensing automatic ignition systems and which do not use a continuous flame pilot shall use purge gas for purging. [District Rule 4311, 5.5] Federally Enforceable Through Title V Permit
20. Open flares (air-assisted, steam-assisted, or non-assisted) in which the flare gas pressure is less than 5 psig shall be operated in such a manner that meets the provisions of 40 CFR 60.18. [District Rule 4311, 5.6] Federally Enforceable Through Title V Permit
21. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
22. Permittee shall sample sweet and noncondensable vapor gas monthly for H₂S concentration and shall maintain daily records of sweet & noncondensable vapor gas flowrate (scfd). [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

23. The permittee shall maintain records of fuel type, quantity, heating value of gas burned, permitted emission factors and annual combustion emissions from units S-1328-1, '-2, '-3, and flare identified on S-1328-7 for demonstration of compliance with above SLC annual limits. Records shall be updated at least monthly. Reports of annual emissions and fuel usage shall be submitted within 30 days after the end of the calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Permittee shall measure H2S concentration from on-line scrubber(s) outlet with District-approved device (e.g. MSA Samplair pump unit No. 463998 and MSA H2S detector tubes) at least daily when scrubber is in operation. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
25. Permittee shall measure daily the non-condensibles gas flow rate and, at least monthly, the non-condensable gas H2S concentration. Records shall be maintained and made readily available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
26. Permittee shall maintain accurate daily records of volume noncondensable gas incinerated in flare. [District Rule 1070] Federally Enforceable Through Title V Permit
27. 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
28. Any steam-enhanced crude oil production well undergoing service or repair during the time the well is not producing shall be exempt from the requirements of Rule 4401. [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
29. The requirements of this rule shall not apply to components serving the produced fluid line. [District Rule 4401, 4.5] Federally Enforceable Through Title V Permit
30. Except for complying with the applicable requirements of Section 6.1, Section 6.6.6 and Section 7.2, the requirements of this rule shall not apply to components described in Section 4.6.1 through Section 4.6.4. An operator claiming an exemption pursuant to Section 4.6 shall provide proof of the applicable criteria to the satisfaction of the APCO. [District Rule 4401, 4.6] Federally Enforceable Through Title V Permit
31. 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, 5.1.1 and 5.1.2] Federally Enforceable Through Title V Permit
32. 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, 5.2.2] Federally Enforceable Through Title V Permit
33. 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, 5.2.2] Federally Enforceable Through Title V Permit
34. 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, 5.3.1] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

35. 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, 5.3.2] Federally Enforceable Through Title V Permit
36. 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, 5.3.3] Federally Enforceable Through Title V Permit
37. Unless exempt under Section 4.7 or Rule 4401, 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, 5.4.1] Federally Enforceable Through Title V Permit
38. Unless exempt under Section 4.7 or Rule 4401, 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, 5.4.2] Federally Enforceable Through Title V Permit
39. Unless exempt under Section 4.7 or Rule 4401, 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, 5.4.3] Federally Enforceable Through Title V Permit
40. Unless exempt under Section 4.7 or Rule 4401, 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, 5.4.4] Federally Enforceable Through Title V Permit
41. Unless exempt under Section 4.7 or Rule 4401, an operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401, 5.4.5] Federally Enforceable Through Title V Permit
42. 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, 5.4.6] Federally Enforceable Through Title V Permit
43. 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, 5.5.1] Federally Enforceable Through Title V Permit
44. 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 5.5.2] Federally Enforceable Through Title V Permit
45. 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, 5.5.3] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

46. 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, 5.5.4] Federally Enforceable Through Title V Permit
47. 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, 5.5.4] Federally Enforceable Through Title V Permit
48. 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, 5.5.5] Federally Enforceable Through Title V Permit
49. 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, 5.5.6] Federally Enforceable Through Title V Permit
50. 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, 5.5.7] Federally Enforceable Through Title V Permit
51. 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
52. 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] Federally Enforceable Through Title V Permit
53. 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, 6.1.5] Federally Enforceable Through Title V Permit
54. 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, 6.1.6] Federally Enforceable Through Title V Permit
55. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401, 6.1.7] Federally Enforceable Through Title V Permit
56. 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, 6.1.10] Federally Enforceable Through Title V Permit
57. If approved by the APCO, an operator need not comply with the annual testing requirement of Section 6.2.1 of Rule 4401 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, 6.2.2] Federally Enforceable Through Title V Permit
58. 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, 6.3.1] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

59. 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, 6.3.2] Federally Enforceable Through Title V Permit
60. 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] Federally Enforceable Through Title V Permit
61. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval for TEOR gas, 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, 6.3.4] Federally Enforceable Through Title V Permit
62. Operator shall maintain an inspection log pursuant to Section 6.4 of Rule 4401, including, 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, 6.1.4 and 6.4] Federally Enforceable Through Title V Permit
63. Permittee shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures, as necessary. [District Rule 4401, 6.5] Federally Enforceable Through Title V Permit
64. In accordance with the approved Operator Management Plan (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, 6.6] Federally Enforceable Through Title V Permit
65. 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, 6.7] Federally Enforceable Through Title V Permit
66. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following requirements: County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
67. Compliance with permit conditions in the Title V permit shall be deemed in compliance with District Rule 4401 (Amended January 15, 1998), excluding sections 5.1 and 5.2 for control systems which have been waived from complying with the requirement of section 6.2.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
68. The requirements of District Rule 4407 (Adopted May 19, 1994) do not apply to this permit unit because it is not an in situ combustion well vent. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

ATTACHMENT C

Permit Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

RECEIVED
MAR 25 2014
SJVAPCD
Southern Region

Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Exxon Mobil Corporation	
2. MAILING ADDRESS: STREET/P.O. BOX: 18271 Hwy 33 CITY: McKittrick STATE: CA 9-DIGIT ZIP CODE: 93251-9737	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: 18271 Hwy 33 CITY: McKittrick, CA ¼ SECTION 19 TOWNSHIP 28S RANGE 21E	INSTALLATION DATE: n/a
4. GENERAL NATURE OF BUSINESS: Petroleum and Natural Gas Production	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) S-1328-7: Thermally enhanced oil recovery operation serving 171 steam drive wells with vapor control system, including permit exempt heater treater (formerly S-1328-56) off-gas, gas/liquid separator, compressor, condensers, two H2S scrubbing vessels, flare, and associated piping; Conversion of ATC S-1328-7-15 to a Permit to Operate coincident with the Title V Minor Modification.	
6. TYPE OR PRINT NAME OF APPLICANT: Jack E. Jones	TITLE OF APPLICANT: Sr. Field Superintendent
7. SIGNATURE OF APPLICANT: 	DATE: 3/21/14 PHONE: (661) 762-7383 FAX: (661) 762-7284 EMAIL: jack.e.jones@exxonmobil.com

For APCD Use Only:

Erwin Rotich

DATE STAMP RECEIVED MAR 25 2014 SJVAPCD Southern Region	FILING FEE RECEIVED: \$ 129 CHECK#: 4250 DATE PAID: pm 3/25/14 PROJECT NO: S-1141364 FACILITY ID: S-1328
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RECEIVED
MAR 25 2014
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: Exxon Mobil Corporation	FACILITY ID: S - 1328
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: Exxon Mobil Corporation	
3. Agent to the Owner: N/A	

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

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

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



Signature of Responsible Official

3/21/14

Date

Jack E. Jones

Name of Responsible Official (please print)

California Operations Sr. Field Superintendent

Title of Responsible Official (please print)

ATTACHMENT D
Current PTO S-1328-7-14

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1328-7-14

EXPIRATION DATE: 03/31/2016

SECTION: NE19 **TOWNSHIP:** 28S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

THERMALLY ENHANCED OIL RECOVERY OPERATION SERVING 171 STEAM DRIVE WELLS WITH VAPOR CONTROL SYSTEM, INCLUDING PERMIT EXEMPT HEATER TREATER (FORMERLY S-1328-56) OFF-GAS, GAS/LIQUID SEPARATOR, COMPRESSOR, CONDENSERS, TWO H₂S SCRUBBING VESSELS, FLARE, AND ASSOCIATED PIPING

PERMIT UNIT REQUIREMENTS

1. Permittee shall maintain a current list of all steam enhanced wells, including identification of all steam enhanced wells with polish rod boxes subject to BACT I&M program connected to this system, and shall update the list whenever a well is added, replaced or deleted. The updated list shall be submitted to the District 60 days prior to the permit anniversary. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Vapor control system shall serve thermally enhanced well vents, permit exempt heater treaters, and Wemco S-1328-58. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Scrubbing solution shall consist only of Sulfa-Check and/or Sulfa-Treat media and additives unless prior District approval is obtained. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Noncondensable vapor gas from this well vent vapor control system may be incinerated in the following devices: steam generator permits S-1328-1, S-1328-2, and S-1328-3, and the standby flare. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Noncondensable vapor gas throughput to flare shall not exceed 0.333 MMscf per day if two (2) or three (3) steam generators are in operation, 0.666 MMscf if one (1) steam generator is in operation, and 1.0 MMscf per day if none of the steam generators are in operation. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Permittee shall maintain accurate component count and emissions calculated using CAPCOA EPA Protocol for Leak Emissions Estimate Fugitive Hydrocarbon Leaks Oil and Gas Production Operations Average Emission Factors, Table 2-4, February 1999. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive VOC emission rate from TEOR components shall not exceed 184.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. VOC content of gas processed shall not exceed 31% by weight. Permittee shall maintain a written record of VOC content (sampled not less than annually) and shall make such records available for District inspection upon request for a period of five years. [District Rule 1070 and District Rule 2201] Federally Enforceable Through Title V Permit
9. Emission rates from the standby flare shall not exceed any of the following: NO_x (as NO₂): 0.0725 lb/MMBtu, SO_x (as SO₂): 115.0 lb/day, PM₁₀: 0.0202 lb/MMBtu, CO: 0.022 lb/MMBtu, or VOC: 0.0021 lb/MMBtu. [District Rules 2201, 4201, 4301 and 4801] Federally Enforceable Through Title V Permit
10. SO_x (as SO₂) = (1.68 x 10E-7) x {(P1 x F1) + (P2 x F2)} = lb/day: P1 = ppmv H₂S in sweet gas, P2 = ppmv H₂S in noncondensable vapor gas, F1 = sweet gas (scf/day), and F2 = noncondensable vapor gas (scf/day). [District Rule 2201] Federally Enforceable Through Title V Permit

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11. Combined annual combustion emissions from units S-1328-1, -2, -3 and the flare identified on S-1328-7 shall not exceed any of the following: NO_x (as NO₂): 25,733 lb/yr, SO_x (as SO₂): 41,975 lb/yr, PM₁₀: 7,154 lb/yr, CO: 22,849 lb/yr, or VOC: 4,271 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
12. If fuel use monitoring provisions fail, emissions shall be calculated based on operational data, or if not available, on set equal to the average of four days prior to failure. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall apply to revise each Permit to Operate subject to the SLC when any unit subject to the SLC has a District-authorized change in daily emission rate, or Permit to Operate is surrendered or sold. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Standby flare shall comply with all requirements of District Rule 4311. [District Rule 4311] Federally Enforceable Through Title V Permit
15. The flame shall be present at all times when combustible gases are vented through the flare. [District Rule 4311, 5.2] Federally Enforceable Through Title V Permit
16. The outlet shall be equipped with an automatic ignition system, or, shall operate with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rule 4311, 5.3] Federally Enforceable Through Title V Permit
17. Except for flares equipped with a flow-sensing ignition system, a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present shall be installed and operated. [District Rule 4311, 5.4] Federally Enforceable Through Title V Permit
18. Flares that use flow-sensing automatic ignition systems and which do not use a continuous flame pilot shall use purge gas for purging. [District Rule 4311, 5.5] Federally Enforceable Through Title V Permit
19. Open flares (air-assisted, steam-assisted, or non-assisted) in which the flare gas pressure is less than 5 psig shall be operated in such a manner that meets the provisions of 40 CFR 60.18. [District Rule 4311, 5.6] Federally Enforceable Through Title V Permit
20. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
21. Permittee shall sample sweet and noncondensable vapor gas monthly for H₂S concentration and shall maintain daily records of sweet & noncondensable vapor gas flowrate (scfd). [District Rule 2201] Federally Enforceable Through Title V Permit
22. The permittee shall maintain records of fuel type, quantity, heating value of gas burned, permitted emission factors and annual emissions for each unit. Records shall be updated at least monthly. Reports of annual emissions and fuel usage shall be submitted within 30 days after the end of the calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Permittee shall measure H₂S concentration from on-line scrubber(s) outlet with District-approved device (e.g. MSA Samplair pump unit No. 463998 and MSA H₂S detector tubes) at least daily when scrubber is in operation. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
24. Permittee shall measure daily the non-condensibles gas flow rate and, at least monthly, the non-condensable gas H₂S concentration. Records shall be maintained and made readily available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
25. Permittee shall maintain accurate daily records of volume noncondensable gas incinerated in flare. [District Rule 1070] Federally Enforceable Through Title V Permit
26. 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
27. Any steam-enhanced crude oil production well undergoing service or repair during the time the well is not producing shall be exempt from the requirements of Rule 4401. [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit

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28. The requirements of this rule shall not apply to components serving the produced fluid line. [District Rule 4401, 4.5] Federally Enforceable Through Title V Permit
29. Except for complying with the applicable requirements of Section 6.1, Section 6.6.6 and Section 7.2, the requirements of this rule shall not apply to components described in Section 4.6.1 through Section 4.6.4. An operator claiming an exemption pursuant to Section 4.6 shall provide proof of the applicable criteria to the satisfaction of the APCO. [District Rule 4401, 4.6] Federally Enforceable Through Title V Permit
30. 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, 5.1.1 and 5.1.2] Federally Enforceable Through Title V Permit
31. 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, 5.2.2] Federally Enforceable Through Title V Permit
32. 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, 5.2.2] Federally Enforceable Through Title V Permit
33. 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, 5.3.1] Federally Enforceable Through Title V Permit
34. 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, 5.3.2] Federally Enforceable Through Title V Permit
35. 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, 5.3.3] Federally Enforceable Through Title V Permit
36. Unless exempt under Section 4.7 or Rule 4401, 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, 5.4.1] Federally Enforceable Through Title V Permit
37. Unless exempt under Section 4.7 or Rule 4401, 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, 5.4.2] Federally Enforceable Through Title V Permit

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38. Unless exempt under Section 4.7 or Rule 4401, 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, 5.4.3] Federally Enforceable Through Title V Permit
39. Unless exempt under Section 4.7 or Rule 4401, 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, 5.4.4] Federally Enforceable Through Title V Permit
40. Unless exempt under Section 4.7 or Rule 4401, an operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401, 5.4.5] Federally Enforceable Through Title V Permit
41. 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, 5.4.6] Federally Enforceable Through Title V Permit
42. 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, 5.5.1] Federally Enforceable Through Title V Permit
43. 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 5.5.2] Federally Enforceable Through Title V Permit
44. 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, 5.5.3] Federally Enforceable Through Title V Permit
45. 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, 5.5.4] Federally Enforceable Through Title V Permit
46. 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, 5.5.4] Federally Enforceable Through Title V Permit
47. 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, 5.5.5] Federally Enforceable Through Title V Permit
48. 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, 5.5.6] Federally Enforceable Through Title V Permit

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49. 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, 5.5.7] Federally Enforceable Through Title V Permit
50. 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
51. 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] Federally Enforceable Through Title V Permit
52. 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, 6.1.5] Federally Enforceable Through Title V Permit
53. 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, 6.1.6] Federally Enforceable Through Title V Permit
54. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401, 6.1.7] Federally Enforceable Through Title V Permit
55. 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, 6.1.10] Federally Enforceable Through Title V Permit
56. If approved by the APCO, an operator need not comply with the annual testing requirement of Section 6.2.1 of Rule 4401 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, 6.2.2] Federally Enforceable Through Title V Permit
57. 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, 6.3.1] Federally Enforceable Through Title V Permit
58. 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, 6.3.2] Federally Enforceable Through Title V Permit
59. 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] Federally Enforceable Through Title V Permit

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60. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval for TEOR gas, 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, 6.3.4] Federally Enforceable Through Title V Permit
61. Operator shall maintain an inspection log pursuant to Section 6.4 of Rule 4401, including, 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, 6.1.4 and 6.4] Federally Enforceable Through Title V Permit
62. Permittee shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures, as necessary. [District Rule 4401, 6.5] Federally Enforceable Through Title V Permit
63. In accordance with the approved Operator Management Plan (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, 6.6] Federally Enforceable Through Title V Permit
64. 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, 6.7] Federally Enforceable Through Title V Permit
65. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following requirements: County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
66. Compliance with permit conditions in the Title V permit shall be deemed in compliance with District Rule 4401 (Amended January 15, 1998), excluding sections 5.1 and 5.2 for control systems which have been waived from complying with the requirement of section 6.2.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
67. The requirements of District Rule 4407 (Adopted May 19, 1994) do not apply to this permit unit because it is not an in situ combustion well vent. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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