



DEC 17 2013

Mr. Joey Barulich
Vintage Production California
9600 Ming Ave. Suite 300
Bakersfield, CA 93311

Re: Notice of Minor Title V Permit Modification
District Facility # S-8282
Project # 1134503

Dear Mr. Barulich:

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 Authority to Construct (ATC) S-8282-42-1 into the Title V operating permit. The ATC is to connect a crude oil storage tank to a vapor control system.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct (ATC) S-8282-42-1, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,



David Warner
Director of Permit Services

Enclosures

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

Central Region (Main Office)
1900 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

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

TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1134503

Engineer: David Torii
Reviewing Engineer: Steve Leonard

Facility Number: S-8282
Facility Name: Vintage Production California
Mailing Address: 9600 Ming Ave. Suite 300
Bakersfield, CA 93311
Contact Name: Joey Barulich
Phone: 661-869-8170

SL 12/12/13

Responsible Official: Denny Brown
Title: Operations Manager

I. PROPOSAL

Vintage Production California is proposing a Title V minor permit modification to incorporate the recently issued ATC S-8282-42-1 into the Title V operating permit. The ATC is to connect a crude oil storage tank to a vapor control system.

II. FACILITY LOCATION

The tank is located within the NE/4 of Section 36, Township 31S, Range 23E in VPC's Light Oil Western stationary source.

III. EQUIPMENT DESCRIPTION

Proposed Title V Operating Permit:

S-8282-42-2: 532 BBL FIXED ROOF CRUDE OIL STORAGE TANK VENTED TO VAPOR CONTROL SYSTEM LISTED ON TANK S-8282-28

IV. SCOPE OF EPA AND PUBLIC REVIEW

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

V. APPLICABLE REQUIREMENTS

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

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

The Changes to the original Permits to Operate are as follows

Condition # on Proposed Permits Minor Modification PTOs	Condition is New, Revised, moved or Removed	Reason for Change from Current PTO
1 through 4	Removed	Dormant Emission Unit conditions were removed
1 through 9	New	The conditions are required for vapor controlled tanks

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.

ATTACHMENT A

Proposed Modified Title V Operating Permit
S-8282-42-2

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-8282-42-2

EXPIRATION DATE: 08/31/2016

SECTION: SE36 **TOWNSHIP:** 31S **RANGE:** 23E

EQUIPMENT DESCRIPTION:

532 BBL FIXED ROOF CRUDE OIL STORAGE TANK VENTED TO VAPOR CONTROL SYSTEM LISTED ON TANK S-8282-28

PERMIT UNIT REQUIREMENTS

1. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
2. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
3. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. VOC fugitive emissions from the components in gas service on tank shall not exceed 0.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Permittee shall maintain accurate component count for tank according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. Any component found to be leaking on two consecutive annual operator inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070]
10. Formerly S-2010-82
11. Formerly S-3079-28

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

12. Formerly S-1216-108.

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

DRAFT

ATTACHMENT B

Authority to Construct S-8282-42-1



AUTHORITY TO CONSTRUCT

PERMIT NO: S-8282-42-1

ISSUANCE DATE: 11/13/2013

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

LOCATION: LIGHT OIL WESTERN STATIONARY SOURCE
KERN COUNTY, CA

SECTION: SE36 TOWNSHIP: 31S RANGE: 23E

EQUIPMENT DESCRIPTION:
MODIFICATION OF 532 BBL FIXED ROOF CRUDE OIL STORAGE TANK: CONNECT TO VAPOR CONTROL SYSTEM LISTED ON TANK S-8282-28

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. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
3. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. VOC fugitive emissions from the components in gas service on tank shall not exceed 0.1 lb/day. [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


DAVID WARNES, Director of Permit Services
S-8282-42-1, Nov 13 2013 10:22AM - TORLIC, Next Inspection NOT Required

6. Permittee shall maintain accurate component count for tank according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Federally Enforceable Through Title V Permit
 7. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
 8. Any component found to be leaking on two consecutive annual operator inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
 9. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
 10. Operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 1070]
 11. Formerly S-2010-82
 12. Formerly S-3079-28
 13. Formerly S-1216-108.
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ATTACHMENT C
Current Permit to Operate No.
(S-8282-42-0)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-8282-42-0

EXPIRATION DATE: 08/31/2016

SECTION: SE36 **TOWNSHIP:** 31S **RANGE:** 23E

EQUIPMENT DESCRIPTION:

532 BBL FIXED ROOF CRUDE OIL STORAGE TANK

PERMIT UNIT REQUIREMENTS

1. No modification to this unit shall be performed without an Authority to Construct for such modification(s), except for changes specified in conditions below. [District Rule 2010] Federally Enforceable Through Title V Permit
2. All liquids shall be removed from this dormant emissions unit and the produced crude oil inlet line shall be physically disconnected. [District Rule 4623] Federally Enforceable Through Title V Permit
3. This equipment shall not be operated for any reason until an Authority to Construct permit is issued and implemented for all necessary retrofits to comply with the applicable requirements of District Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
4. The operator of a fixed roof tank shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 4623] Federally Enforceable Through Title V Permit
5. Formerly S-2010-82
6. Formerly S-3079-28
7. Formerly S-1216-108.

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

ATTACHMENT D

Emissions Increases

SSIPE (lb/yr)				
NOx	VOC	CO	SOx	PM10
0	0	0	0	0

ATTACHMENT E

Application



Vintage Production California LLC

A subsidiary of Occidental Petroleum Corporation



9600 Ming Avenue, Suite 300
Bakersfield, California 93311
Phone 661.869.8000, Fax 661.869.8170

RECEIVED
NOV 25 2013
Permit Services
GROUP

November 22, 2013

Mr. Martin Keast
San Joaquin Valley Unified APCD
1990 East Gettysburg Avenue
Fresno, CA 93726-0244

SUBJECT: ADMINISTRATIVE AMENDMENT TO TITLE V PERMIT S-8282
IMPLEMENT AUTHORITY TO CONSTRUCT: S-8282-42-1

Dear Mr. Keast:

Please find attached the Title V permit administrative amendment application.

If you have any questions please call me at (661) 869-8075.

Sincerely,

Joey Barulich
HES Consultant
Vintage Production California LLC

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

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

NOV 25 2013

Permit Services

1. PERMIT TO BE ISSUED TO: Vintage Production California LLC (VPC)	
2. MAILING ADDRESS: STREET/P.O. BOX: 9600 Ming Avenue, Suite 300	
CITY: Bakersfield STATE: CA	9-DIGIT ZIP CODE: 93311
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: BV Hills CITY: LOW SE ¼ SECTION 36 TOWNSHIP 31S RANGE 23E	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: Crude Oil and Natural Gas Production	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Incorporate ATC S-8282-42-1 into Title V permit S-8282 – Vintage Production California LLC, Light Oil Western stationary source. Project S-1133804	
6. TYPE OR PRINT NAME OF APPLICANT: Joey Barulich – Vintage Production California LLC	TITLE OF APPLICANT: HES Consultant
7. SIGNATURE OF APPLICANT: 	DATE: 11/22/13 PHONE: (661) 869-8075 FAX: (661) 869-8170 EMAIL: joey_barulich@oxy.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: S-1134503 FACILITY ID: S-8282

**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
 MINOR PERMIT MODIFICATION

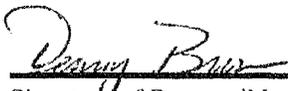
ADMINISTRATIVE
AMENDMENT

COMPANY NAME: Vintage Production California LLC	FACILITY ID: - S - 8282
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: Vintage Production California LLC	
3. Agent to the Owner: Joey Barulich	

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

- Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s) which the source is in compliance.
- Based on information and belief formed after reasonable inquiry, the source 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

12-11-13
Date

Denny Brown
Name of Responsible Official (please print)

Operations Manager
Title of Responsible Official (please print)