



JUL 08 2013

Mr. Charles Comfort
TRC Operating Company
PO Box 227
Taft, CA 93268

Re: Notice of Minor Title V Permit Modification
District Facility # S-2622
Project # 1132651

Dear Mr. Comfort:

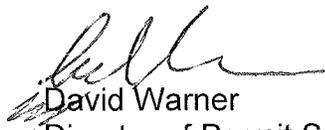
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authorities to Construct (ATCs) S-2622-7-6, '-21-0, and '-22-0 into the Title V operating permit. The project authorized installation of a 1500 bbl wash tank and 1000 bbl crude oil storage tank connected to existing vapor control system S-2622-7.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authorities to Construct (ATCs) S-2622-7-6, '-21-0, and '-22-0, and application. 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)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

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

TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1132651

Engineer: Richard Edgehill
Date: June 25, 2013

Facility Number: S-2622
Facility Name: TRC Operating Company
Mailing Address: PO Box 227
Taft, CA 93268

Reviewed by AP SURR ARIE

JUN 26 2013

Contact Name: Charles Comfort
Secretary/Treasurer

Phone: (661) 763-0081

Responsible Official: Charles Comfort
Title: Secretary/Treasurer

I. PROPOSAL

TRC Operating Company is proposing a minor modification to their Title V permit to incorporate Authorities to Construct (ATC) S-2622-7-6, '-21-0, and '-22-0 into their Title V operating permit. The project authorized installation of a 1500 bbl wash tank and 1000 bbl crude oil storage tank connected to existing vapor control system S-2622-7. The project also authorized the following devices for combustion of vapors from tanks (listed in equipment description) as stated in the following revised PTO condition:

Vapor collected from the vapor control system ~~servicing this tank and tanks S-2622-14 and '16~~ may be incinerated in steam generators S-2622-1, S-2622-11, and S-2622-17. [District Rule 2201] N

Please note that the ATCs were issued prior to the initial Title V permit and therefore do not include Federally Enforceable Conditions.

The purpose of this evaluation is to identify all applicable requirements, to determine if the facility will comply with the applicable requirements, and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

The equipment is located at NE Section 21, Township 29S, Range 21E in TRC Operating Company's heavy oil western stationary source in Kern County, CA.

III. EQUIPMENT DESCRIPTION

S-2622-7-7: 1000 BBL FIXED ROOF CRUDE OIL STOCK TANK INCLUDING VAPOR CONTROL SYSTEM SERVING THIS TANK AND TANKS S-2622-14, '-16, '-21, and '-22 INCLUDING STANDBY HIRT VCS-200 VAPOR PROCESSOR WITH NATURAL GAS PILOT, PRESSURE VACUUM RELIEF VALVE, VAPOR PIPING AND COMPRESSORS (CYMRIC-OHIO LEASE)

S-2622-21-1: 1500 BBL CRUDE OIL WASH TANK SERVED BY VAPOR CONTROL SYSTEM LISTED ON TEOR PERMIT S-2622-7

S-2622-22-1: 1000 BBL CRUDE OIL WASH TANK SERVED BY VAPOR CONTROL SYSTEM LISTED ON TEOR PERMIT S-2622-7

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 following changes to current PTO S-2622-7-7 will be made and will appear in the proposed PTO S-2622-7-8. As ATC S-2622-7-6 authorized connection of tanks '-21 and '-22 to the vapor control system, the PTO '-7-7 equipment description was modified as follows (new words underlined, delete words in ~~strikeout~~):

Draft PTO S-2622-7-8

1000 BBL FIXED ROOF CRUDE OIL STOCK TANK INCLUDING VAPOR CONTROL SYSTEM SERVING THIS TANK AND TANKS S-2622-14 and, '16, '21, AND '22 INCLUDING STANDBY HIRT VCS-200 VAPOR PROCESSOR WITH NATURAL GAS PILOT, PRESSURE VACUUM RELIEF VALVE, VAPOR PIPING AND COMPRESSORS (CYMRIC-OHIO LEASE)

Draft PTO S-2622-7-8	Current PTO S-2622-7-7	Justification
1-4	1-4	
5	5	Draft PTO includes revision to listing of steam generator disposal devices as requested by applicant in project 1105019 (ATC '7-6)
6-27	6-27	
28	28	Draft PTO does not include "(as required by Condition #5)" as this does not add clarification and is therefore not necessary
29	29	

Proposed PTOs '21-1 and '22-1

These are new emissions units. The draft PTOs include all of the ATC conditions except Conditions #1 and #2 (below) the following which are included on the facility wide PTO '0-2.

1. ~~To maintain status as a small producer, permittee's crude oil production shall average less than 6000 bbl/day from all operations within Kern County and permittee shall not engage in refining, transporting, or marketing of refined petroleum products. [District Rule 2080] N~~
2. ~~{98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] N~~

Condition #19 (below) was also not included on in the draft PTO as it has been satisfied.

19. ~~ATC shall be implemented concurrently with or subsequent to ATC S-2622-7-6. [District Rule 2201] N~~

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

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

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

VIII. ATTACHMENTS

- A. Proposed draft Title V PTOs
- B. Authorities to Construct
- C. Permit Application
- D. Previous Title V PTO

ATTACHMENT A

Proposed Draft Title V PTOs

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2622-7-8

EXPIRATION DATE: 05/31/2017

SECTION: NE21 **TOWNSHIP:** 29S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

1000 BBL FIXED ROOF CRUDE OIL STOCK TANK INCLUDING VAPOR CONTROL SYSTEM SERVING THIS TANK AND TANKS S-2622-14, '16, '21, AND '22 INCLUDING STANDBY HIRT VCS-200 VAPOR PROCESSOR WITH NATURAL GAS PILOT, PRESSURE VACUUM RELIEF VALVE, VAPOR PIPING AND COMPRESSORS (CYMRIC-OHIO LEASE)

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
2. This vapor control system may receive vapor from well vents listed in permit S-2622-8. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Hirt burner shall be fired on natural gas and/or TEOR gas from S-2622-8 with a sulfur content of no greater than 1.0 gr-S/100 scf or pre-treated using a sulfa-treat (or equivalent) system for 95% control of SO_x emissions. [District Rule 2201 and 4801] Federally Enforceable Through Title V Permit
4. When complying with sulfur emission limits by fuel analysis, each fuel source shall be tested at startup and annually thereafter for sulfur content. Gas analyses shall be performed using ASTM method D3246 or double GC for H₂S and mercaptans. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Vapor collected from the vapor control system may be incinerated in steam generators S-2622-1, S-2622-11, and S-2622-17. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The tank shall be equipped with a vapor control system consisting of a closed system that collects VOCs from the storage tank and a VOC control device. The vapor control system shall be APCO-approved. Collected vapors shall be directed to approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in section 6.4 of District Rule 4623. [District Rule 2201] Federally Enforceable Through Title V Permit
7. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
8. Maximum VOC content of vapor in the tank vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Permittee shall conduct true vapor pressure (TVP) and API gravity testing of fluid stored by tanks S-2622-7, '14, and '16 at least once every 24 months during summer (July- September), and/or whenever there is a change in the source or type of organic liquid stored in tanks S-2622-7, '14, and '16 in order to maintain exemption from the rule. Sample for TVP analysis shall be taken from tank with highest storage temperature. [District Rule 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
11. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
12. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
13. Permittee shall submit the records of TVP and API gravity testing to the Compliance Section of the Southern Region of the SJVAPCD within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit
14. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] Federally Enforceable Through Title V Permit
15. Operator shall conduct quarterly gas sampling of gas from vapor recovery system serving tanks S-2622-7 , '-14, and '-16. If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
16. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
17. 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. [District Rule 2201] Federally Enforceable Through Title V Permit
18. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
19. All piping, fittings, and valves 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 provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2201] Federally Enforceable Through Title V Permit
20. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
21. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [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.

22. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2201] Federally Enforceable Through Title V Permit
24. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired 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. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Permittee shall maintain records of the VOC content of vapor in the tank vapor control system, including date and test results. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Permittee shall maintain accurate records of sulfur content of gas combusted in Hirt burner and shall make such records readily available for District inspection upon request. [District Rule 1070]
28. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2622-21-1

EXPIRATION DATE: 05/31/2017

SECTION: NE21 **TOWNSHIP:** 29S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

1500 BBL FIXED ROOF CRUDE OIL WASH TANK CONNECTED TO VAPOR RECOVERY SYSTEM LISTED IN S-2622-7 (CYMRIC-OHIO LEASE)

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PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
2. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
3. VOC content of tank vapor space and vapor control system piping and components shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall conduct quarterly gas sampling of tank vapor space and vapor control system piping and components. If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All vessel and vapor control system piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated to methane, to ensure compliance with the provisions of this permit. If any of the vessel components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no vessel components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 ft above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) Eliminate or minimize the leak within 8 hours after detection. (b) If the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices; and eliminate the leak within 48 hours after detection. (c) In no event shall the total time to minimize and eliminate the leak exceed 56 hours after detection. [District Rule 2201] Federally Enforceable Through Title V Permit
7. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [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.

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8. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
10. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 2201] Federally Enforceable Through Title V Permit
13. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Permittee shall maintain a written record of the VOC content of the gas sampled. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit

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

DRAFT

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2622-22-1

EXPIRATION DATE: 05/31/2017

SECTION: NE21 **TOWNSHIP:** 29S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

1000 BBL FIXED ROOF CRUDE OIL STOCK TANK CONNECTED TO VAPOR RECOVERY SYSTEM LISTED IN S-2622-7 (CYMRIC-OHIO LEASE)

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
2. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
3. VOC content of tank vapor space and vapor control system piping and components shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall conduct quarterly gas sampling of tank vapor space and vapor control system piping and components. If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All vessel and vapor control system piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated to methane, to ensure compliance with the provisions of this permit. If any of the vessel components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no vessel components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 ft above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) Eliminate or minimize the leak within 8 hours after detection. (b) If the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices; and eliminate the leak within 48 hours after detection. (c) In no event shall the total time to minimize and eliminate the leak exceed 56 hours after detection. [District Rule 2201] Federally Enforceable Through Title V Permit
7. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [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.

8. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
10. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 2201] Federally Enforceable Through Title V Permit
13. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Permittee shall maintain a written record of the VOC content of the gas sampled. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit

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

DRAFT

ATTACHMENT B

Authorities to Construct

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2622-7-6

ISSUANCE DATE: 01/19/2011

LEGAL OWNER OR OPERATOR: TRC OPERATION COMPANY, INC.

MAILING ADDRESS: P.O. BOX 227
TAFT, CA 93268

LOCATION: HEAVY OIL WESTERN
CA

SECTION: NE21 TOWNSHIP: 29S RANGE: 21E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 1000 BBL FIXED ROOF CRUDE OIL STOCK TANK INCLUDING VAPOR CONTROL SYSTEM SERVING THIS TANK AND TANKS S-2622-14 AND '16, INCLUDING STANDBY HIRT VCS-200 VAPOR PROCESSOR WITH NATURAL GAS PILOT, PRESSURE VACUUM RELIEF VALVE, VAPOR PIPING AND COMPRESSORS (CYMRIC-OHIO LEASE): CONNECT TANKS S-2622-21 AND S-2622-22 TO THE VAPOR CONTROL SYSTEM

CONDITIONS

1. To maintain status as a small producer, permittee's crude oil production shall average less than 6000 bbl/day from all operations within Kern County and permittee shall not engage in refining, transporting, or marketing of refined petroleum products. [District Rule 2080]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. This vapor control system may receive vapor from well vents listed in permit S-2622-8. [District Rule 2201]
5. Vapor collected from the vapor control system may be incinerated in steam generators S-2622-1, S-2622-11, and S-2622-17. [District Rule 2201]
6. VOC content of tank vapor space and vapor control system piping and components shall not exceed 10% by weight. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

S-2622-7-6: Jun 24 2013 4:10PM -- EDGEHILL : Joint Inspection NOT Required

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

7. Operator shall conduct quarterly gas sampling of tank vapor space and vapor control system piping and components. If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201]
8. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
9. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 2201]
10. 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. [District Rule 2201]
11. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 2201]
12. 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 Rule 2201]
13. 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 Rule 2201]
14. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623]
15. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 2201]
16. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 2201]
17. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 2201]
18. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 2201]
19. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 2201]
20. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 2201]
21. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 4623, 6.3]
22. ATC shall be implemented concurrently with ATCs S-2622-21-0 and '-22-0. [District Rule 2201]

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2622-21-0

ISSUANCE DATE: 01/19/2011

LEGAL OWNER OR OPERATOR: TRC OPERATION COMPANY, INC.

MAILING ADDRESS: P.O. BOX 227
TAFT, CA 93268

LOCATION: HEAVY OIL WESTERN
CA

SECTION: NE21 TOWNSHIP: 29S RANGE: 21E

EQUIPMENT DESCRIPTION:

1,500 BBL FIXED ROOF CRUDE OIL WASH TANK CONNECTED TO VAPOR RECOVERY SYSTEM LISTED IN S-2622-7 (CYMRIC-OHIO LEASE)

CONDITIONS

1. To maintain status as a small producer, permittee's crude oil production shall average less than 6000 bbl/day from all operations within Kern County and permittee shall not engage in refining, transporting, or marketing of refined petroleum products. [District Rule 2080]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623]
5. VOC content of tank vapor space and vapor control system piping and components shall not exceed 10% by weight. [District Rule 2201]
6. Operator shall conduct quarterly gas sampling of tank vapor space and vapor control system piping and components. If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

S-2622-21-0 : Jun 25 2013 8:47AM -- EDGEHILL : Joint Inspection NOT Required

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

7. All vessel and vapor control system piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated to methane, to ensure compliance with the provisions of this permit. If any of the vessel components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no vessel components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 ft above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201]
8. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) Eliminate or minimize the leak within 8 hours after detection. (b) If the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices; and eliminate the leak within 48 hours after detection. (c) In no event shall the total time to minimize and eliminate the leak exceed 56 hours after detection. [District Rule 2201]
9. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 2201]
10. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201]
11. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. [District Rule 2201]
12. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
13. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 2201]
14. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 2201]
15. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 2201]
16. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 2201]
17. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 2201]
18. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 2201]
19. Permittee shall maintain a written record of the VOC content of the gas sampled. [District Rule 2201]
20. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 4623]
21. ATC shall be implemented concurrently with or subsequent to ATC S-2622-7-6. [District Rule 2201]

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2622-22-0

ISSUANCE DATE: 01/19/2011

LEGAL OWNER OR OPERATOR: TRC OPERATION COMPANY, INC.

MAILING ADDRESS: P.O. BOX 227
TAFT, CA 93268

LOCATION: HEAVY OIL WESTERN
CA

SECTION: NE21 TOWNSHIP: 29S RANGE: 21E

EQUIPMENT DESCRIPTION:

1,000 BBL FIXED ROOF CRUDE OIL STOCK TANK CONNECTED TO VAPOR RECOVERY SYSTEM LISTED IN S-2622-7 (CYMRIC-OHIO LEASE)

CONDITIONS

1. To maintain status as a small producer, permittee's crude oil production shall average less than 6000 bbl/day from all operations within Kern County and permittee shall not engage in refining, transporting, or marketing of refined petroleum products. [District Rule 2080]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623]
5. VOC content of tank vapor space and vapor control system piping and components shall not exceed 10% by weight. [District Rule 2201]
6. Operator shall conduct quarterly gas sampling of tank vapor space and vapor control system piping and components. If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

7. All vessel and vapor control system piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated to methane, to ensure compliance with the provisions of this permit. If any of the vessel components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no vessel components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 ft above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired upon detection. [District Rule 2201]
8. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) Eliminate or minimize the leak within 8 hours after detection. (b) If the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices; and eliminate the leak within 48 hours after detection. (c) In no event shall the total time to minimize and eliminate the leak exceed 56 hours after detection. [District Rule 2201]
9. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 2201]
10. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201]
11. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. [District Rule 2201]
12. VOC content of vapor shall be determined by ASTM D1945, ASTM D1946, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201]
13. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 2201]
14. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 2201]
15. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 2201]
16. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 2201]
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18. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 2201]
19. Permittee shall maintain a written record of the VOC content of the gas sampled. [District Rule 2201]
20. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 4623]
21. ATC shall be implemented concurrently with or subsequent to ATC S-2622-7-6. [District Rule 2201]

ATTACHMENT C

Permit Application

RECEIVED
JUN 21 2013
SJVAPCD
Southern Region

June 21, 2013

Mr. Leonard Scandura
Compliance Services
San Joaquin Valley Unified APCD
34946 Flyover Court
Bakersfield, CA 93308

Subject: Title V Minor Modification - S-3088 & S-2622

Dear Mr. Scandura:

Please find the attached application for a Title V Minor Modification to incorporate five existing Authorities to Construct (ATC) into the Title V Permit recently issued to TRC Operating Company (TRC) for their heavy oil western source. Also included is a check in the amount of \$152 for the application filing fee.

Please contact Nicholas Diercks at 661-377-0073 x13 if you have any questions or comments.

Sincerely,



Charlie Comfort
Secretary/Treasurer

TRC 
OPERATING COMPANY, INC.

phone: 661.763.0081 | fax: 661.763.5028 | mail: P.O. Box 227, Taft, CA 93268

5-3088-25-1 through 25-1

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

RECEIVED

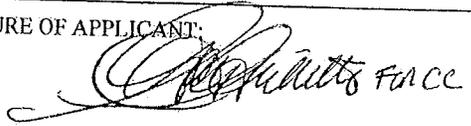
JUN 21 2013

ADMINISTRATIVE AMENDMENT

MINOR MODIFICATION

SIGNIFICANT MODIFICATION

SJVAPCD Southern Region

1. PERMIT TO BE ISSUED TO: TRC Operating Company	
2. MAILING ADDRESS: STREET/P.O. BOX: P.O. Box 227 CITY: Taft STATE: CA 9-DIGIT ZIP CODE: 93268	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: Heavy Oil Western CITY: _____ _____ 1/4 SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: 3/1/2012
4. GENERAL NATURE OF BUSINESS: Crude Oil Production	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) S-2622-7-6: 1,000 BBL Tank S-2622-21-0: 1,500 BBL Tank S-2622-22-0: 1,000 BBL Tank S-3088-25-0: 500 BBL Tank S-3088-26-0: 500 BBL Tank S-3088-27-0: 500 BBL Tank S-3088-28-0: 500 BBL Tank S-3088-29-0: 500 BBL Tank	
6. TYPE OR PRINT NAME OF APPLICANT: Charlie Comfort	TITLE OF APPLICANT: Secretary/Treasurer
7. SIGNATURE OF APPLICANT:  DATE: 6/21/13	PHONE: (661) 763-0081 FAX: (661) 763-5028 EMAIL: gary@trcopco.com

For APCD Use Only:

EnviroTech Consultants, Inc.

DATE STAMP	FILING FEE RECEIVED: \$ 152.00 CHECK#: 4047
	DATE PAID: JUN 21-13
	PROJECT NO: S-1132651 FACILITY ID: S-2622

S-1132659

RECEIVED
JUN 21 2013
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)

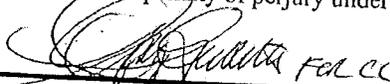
- SIGNIFICANT PERMIT MODIFICATION
 MINOR PERMIT MODIFICATION
 ADMINISTRATIVE AMENDMENT

COMPANY NAME: TRC OPERATING COMPANY	FACILITY ID: S - 2622 & S-3088
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: TRC Operating Co. Inc.	
3. Agent to the Owner:	

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

6/21/13
Date

Charlie Comfort

Name of Responsible Official (please print)

Secretary/Treasurer

Title of Responsible Official (please print)

Mailing Address: Central Regional Office * 1990 E. Gettysburg Avenue * Fresno, California 93726-0244 * (559) 230-5900 * FAX (559) 230-6061

TVFORM-009
Rev: July 2005

ATTACHMENT D

Previous Title V PTO

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2622-7-7

EXPIRATION DATE: 05/31/2017

SECTION: NE21 **TOWNSHIP:** 29S **RANGE:** 21E

EQUIPMENT DESCRIPTION:

1000 BBL FIXED ROOF CRUDE OIL STOCK TANK INCLUDING VAPOR CONTROL SYSTEM SERVING THIS TANK AND TANKS S-2622-14 AND '16, INCLUDING STANDBY HIRT VCS-200 VAPOR PROCESSOR WITH NATURAL GAS PILOT, PRESSURE VACUUM RELIEF VALVE, VAPOR PIPING AND COMPRESSORS (CYMRIC-OHIO LEASE)

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
2. This vapor control system may receive vapor from well vents listed in permit S-2622-8. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Hirt burner shall be fired on natural gas and/or TEOR gas from S-2622-8 with a sulfur content of no greater than 1.0 gr-S/100 scf or pre-treated using a sulfa-treat (or equivalent) system for 95% control of SOx emissions. [District Rule 2201 and 4801] Federally Enforceable Through Title V Permit
4. When complying with sulfur emission limits by fuel analysis, each fuel source shall be tested at startup and annually thereafter for sulfur content. Gas analyses shall be performed using ASTM method D3246 or double GC for H2S and mercaptans. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Vapor collected from the vapor control system serving this tank and tanks S-2622-14 and '-16 may be incinerated in steam generator S-2622-17. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The tank shall be equipped with a vapor control system consisting of a closed system that collects VOCs from the storage tank and a VOC control device. The vapor control system shall be APCO-approved. Collected vapors shall be directed to approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in section 6.4 of District Rule 4623. [District Rule 2201] Federally Enforceable Through Title V Permit
7. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
8. Maximum VOC content of vapor in the tank vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Permittee shall conduct true vapor pressure (TVP) and API gravity testing of fluid stored by tanks S-2622-7, '-14, and '-16 at least once every 24 months during summer (July- September), and/or whenever there is a change in the source or type of organic liquid stored in tanks S-2622-7, '-14, and '-16 in order to maintain exemption from the rule. Sample for TVP analysis shall be taken from tank with highest storage temperature. [District Rule 4623] Federally Enforceable Through Title V Permit
10. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] 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. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
12. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
13. Permittee shall submit the records of TVP and API gravity testing to the Compliance Section of the Southern Region of the SJVAPCD within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit
14. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] Federally Enforceable Through Title V Permit
15. Operator shall conduct quarterly gas sampling of gas from vapor recovery system serving tanks S-2622-7, '-14, and '-16. If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
16. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
17. 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. [District Rule 2201] Federally Enforceable Through Title V Permit
18. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
19. All piping, fittings, and valves 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 provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2201] Federally Enforceable Through Title V Permit
20. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
21. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2201] Federally Enforceable Through Title V Permit
22. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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23. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2201] Federally Enforceable Through Title V Permit
24. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired 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. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Permittee shall maintain records of the VOC content of vapor in the tank vapor control system, including date and test results. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Permittee shall maintain accurate records of sulfur content of gas combusted in Hirt burner (as required by Condition #5) and shall make such records readily available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
28. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit

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