



NOV 06 2015

Mr. Zachary Dransoff  
California Resources Production Corp  
9600 Ming Ave., Suite 300  
Bakersfield, CA 93311

**Re: Notice of Minor Title V Permit Modification  
District Facility # S-1327  
Project # 1151110**

Dear Mr. Dransoff:

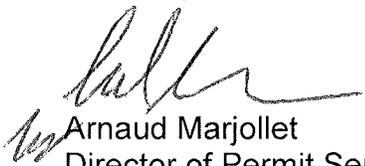
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued S-1327-42-10, '217-0 and '218-0 (under project 1151110) into the Title V operating permit. The ATCs authorized installation of a heater treater and a free water knockout vessel.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-1327-42-10, '217-0 and '218-0, 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,



Arnaud Marjollet  
Director of Permit Services

Enclosures

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

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

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

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061  
[www.valleyair.org](http://www.valleyair.org)

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

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



# TITLE V APPLICATION REVIEW

Minor Modification  
Project #: S-1151110

Engineer: David Torii  
Reviewing Engineer: Rich Karrs

Facility Number: S-1327  
Facility Name: California Resources Production Corp  
Mailing Address: 9600 Ming Ave., Suite 300  
Bakersfield, CA 93311  
Contact Name: Zachary Dransoff  
Phone: (661) 412-5035

Responsible Official: Dewayne Smith  
Title: Surface Operations Manager

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## I. PROPOSAL

California Resources Production Corp (CRP) is proposing a Title V minor permit modification to incorporate the recently issued ATCs S-1327-42-10, '217-0 and '218-0 into the Title V operating permit. The ATCs authorized installation of a heater treater and a free water knockout vessel.

## II. FACILITY LOCATION

The equipment will be located at the north Antelope Hills Facility within Section 15, Township 27S, Range 19E in CRP's Heavy Oil western stationary source.

## III. EQUIPMENT DESCRIPTION

Proposed Title V Operating Permit:

- S-1327-42-10: TEOR OPERATION WVVC SYSTEM INCLUDING 100 STEAM DRIVE WELLS, HEAT EXCHANGER (OPTIONAL), GAS/LIQUID SEPARATOR, VACUUM PUMP SKID, SULFUR REMOVAL SYSTEM, AND COMPRESSED VAPOR PIPING TO DISTRICT APPROVED INCINERATION/DISPOSAL DEVICES LISTED ON PERMIT S-1326-32, '-34, '-35 AND 4.58 MMBTU/HR COANDA EFFECT SMOKELESS FLARE WITH NATURAL GAS/PROPANE PILOT
- S-1327-217-0: 460 BBL HEATER TREATER WITH PERMIT-EXEMPT BURNERS (S-1327-PEER-4) VENTED TO THE VAPOR RECOVERY SYSTEM LISTED ON S-1327-42

S-1327-218-0: 560 BBL FWKO VESSEL VENTED TO THE VAPOR RECOVERY SYSTEM LISTED ON S-1327-42

#### 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

S-1327-42-11		
Condition # on Proposed Permits Minor Modification PTOs	Condition is New, Revised, moved or Removed	Reason for Change from Current PTO
4	New	Indicate that vapors are received from S-1327-217 and '218

S-1327-217-1		
Condition # on Proposed Permits Minor Modification PTOs	Condition is New, Revised, moved or Removed	Reason for Change from Current PTO
1 – 17	New	new equipment

S-1327-218-1		
Condition # on Proposed Permits Minor Modification PTOs	Condition is New, Revised, moved or Removed	Reason for Change from Current PTO
1 – 17	New	new equipment

#### 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 Permits  
S-1327-42-10, '217-0 and '218-0

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1327-42-11

EXPIRATION DATE: 02/28/2017

SECTION: 15 TOWNSHIP: 27S RANGE: 19E

## EQUIPMENT DESCRIPTION:

TEOR OPERATION WVC SYSTEM INCLUDING 100 STEAM DRIVE WELLS, HEAT EXCHANGER (OPTIONAL), GAS/LIQUID SEPARATOR, VACUUM PUMP SKID, SULFUR REMOVAL SYSTEM, AND COMPRESSED VAPOR PIPING TO DISTRICT APPROVED INCINERATION/DISPOSAL DEVICES LISTED ON PERMIT S-1326-32, '-34, '-35 AND 4.58 MMBTU/HR COANDA EFFECT SMOKELESS FLARE WITH NATURAL GAS/PROPANE PILOT

## PERMIT UNIT REQUIREMENTS

1. All components of well vent vapor collection and control systems shall be maintained in good working condition. [District Rule 4401] Federally Enforceable Through Title V Permit
2. Leaks shall be inspected and repaired as specified in Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
3. Total uncontrolled VOC emissions from all well vents shall be reduced by at least 99%. [District Rule 4401] Federally Enforceable Through Title V Permit
4. TEOR operation is authorized to receive vapors from heater treater S-1327-217 and FWKO S-1327-218. [District Rule 2201] Federally Enforceable Through Title V Permit
5. TEOR operation shall include heat exchanger, gas/liquid separator, vacuum pump skid, and compressed vapor piping with vapors incinerated in steam generators '-32, '-34, '-35, '-71, '-72, and/or flare. [District Rule 2201] Federally Enforceable Through Title V Permit
6. There shall be no leaks in excess of 10,000 ppmv when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
7. 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 1/4 or 5% opacity. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Flare shall be equipped with waste gas volume flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Flare shall be equipped with a heat sensing device to detect the presence of a propane or natural gas pilot flame which is burning at all times when combustible gases are vented to the flare. [District Rule 4311] Federally Enforceable Through Title V Permit
10. Total concentration of sulfur compounds in gas incinerated in incineration devices shall not exceed 4 ppmv. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
11. Maximum amount of waste gas combusted in incineration devices shall not exceed 250 MMBtu/day or 31,025 MMBtu/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Emissions from the flare shall not exceed any of the following (based on total gas combusted): PM-10: 0.008 lb/MMBtu; NOx (as NO2): 0.068 lb/MMBtu; VOC: 0.063 lb/MMBtu; or CO: 0.37 lb/MMBtu. [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.

13. Maximum VOC content of TEOR operation vapor shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Operator shall conduct quarterly sampling of vapor to qualify for exemption from fugitive component counts for components handling vapor with less than 10% VOC by weight. If vapor sampled contains less than 10% VOCs for 8 consecutive quarterly samplings, then sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
15. 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
16. Measured heating value and quantity of gas flared shall be used to determine compliance with heat input limits. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Permittee shall maintain a written record of the VOC content and heating value of the gas sampled. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Permittee shall determine sulfur content of gas flared weekly using ASTM method D3246 or double GC for H<sub>2</sub>S and mercaptans or Draeger tube analysis. Sulfur content of waste gas shall be measured within one day of restarting unit if the unit has not been in use for more than 7 days. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
19. Weekly records of the waste gas sulfur content and daily records of waste gas flow rate shall be maintained, retained on the premises for a period of at least five years, and made available for District inspection on request. [District Rules 2201, 4311, and 4801] Federally Enforceable Through Title V Permit
20. Each quarter in which the flare is operated for three (3) hours or more, the permittee shall perform a visible emissions inspection using either EPA Method 22 or EPA Method 9. [District Rule 2520] Federally Enforceable Through Title V Permit
21. A flame shall be present at all time when combustible gases are vented through the flare. [District Rule 4311] Federally Enforceable Through Title V Permit
22. The outlet shall be equipped with an automatic ignition system, or, shall be operated 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] Federally Enforceable Through Title V Permit
23. 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] Federally Enforceable Through Title V Permit
24. 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] Federally Enforceable Through Title V Permit
25. For flares used during an emergency, record of the duration of flare operation, amount of gas burned, and the nature of the emergency situation. [District Rule 4311] Federally Enforceable Through Title V Permit
26. All records shall be maintained, retained on-site for a minimum of five years, and made available to the APCO, ARB, and EPA upon request. [District Rule 4311] Federally Enforceable Through Title V Permit
27. Permittee shall maintain with the permit a current listing of all steam enhanced wells connected to the casing vent control system and shall make such listing readily available for District inspection upon request. [District Rule 4401]
28. The inspection and re-inspection requirements of Rule 4401 shall not apply to components exclusively handling gas/vapor or liquid with a VOC content of 10% by weight or less. [District Rule 4401]
29. Gas and liquid leaks are as defined in Section 3.20 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

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] 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 5.8 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 5.6.2.1 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] 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 5.8 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 3 of Rule 4401. [District Rule 4401] 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 5.6.2 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 5.9 of Rule 4401. [District Rule 4401] 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] 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] Federally Enforceable Through Title V Permit
36. 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] Federally Enforceable Through Title V Permit
37. 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 5.9.2.3 of Rule 4401, or the component is found to be in compliance with the requirements of this rule. [District Rule 4401] Federally Enforceable Through Title V Permit
38. 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] Federally Enforceable Through Title V Permit
39. Except for leaking critical components or leaking essential components subject to the requirements of Section 5.9.7 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] 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.

40. 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] Federally Enforceable Through Title V Permit
41. 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] Federally Enforceable Through Title V Permit
42. 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] Federally Enforceable Through Title V Permit
43. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401] Federally Enforceable Through Title V Permit
44. 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] Federally Enforceable Through Title V Permit
45. Operator of any steam-enhanced crude oil production well shall keep an inspection log maintained pursuant to Section 6.4 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
46. 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] Federally Enforceable Through Title V Permit
47. 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] Federally Enforceable Through Title V Permit
48. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401] Federally Enforceable Through Title V Permit
49. Operator shall submit to the APCO not later than June 14, 2007 a list of all gauge tanks, as defined in Section 3.17. The list shall contain the size, identification number, the location of each gauge tank and specify whether the gauge tank is upstream of all front line production equipment. [District Rule 4401] Federally Enforceable Through Title V Permit
50. The results of gauge tank TVP testing conducted pursuant to Section 6.2.5 shall be submitted to the APCO within 60 days after the completion of the testing. [District Rule 4401] Federally Enforceable Through Title V Permit
51. 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] Federally Enforceable Through Title V Permit
52. 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] 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.

53. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401] Federally Enforceable Through Title V Permit
54. Operator shall maintain an inspection log in which an operator records, at a minimum, all of the following information for each inspection performed: The total number of components inspected, total number and percentage of leaking components found by component type, location, type, and name or description of each leaking component and description of any unit where the leaking component is found, date of leak detection and the method of leak detection. For gaseous leaks, the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak. the date of repair, replacement, or removal from operation of leaking components, identify and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier, methods used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier, the date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced, the inspector's name, business mailing address, and business telephone number, date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401] 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-1327-217-1

**EXPIRATION DATE:** 02/28/2017

**SECTION:** 15 **TOWNSHIP:** 27S **RANGE:** 19E

**EQUIPMENT DESCRIPTION:**

460 BBL HEATER TREATER WITH PERMIT-EXEMPT BURNERS (S-1327-PEER-4) VENTED TO THE VAPOR RECOVERY SYSTEM LISTED ON S-1327-42

## PERMIT UNIT REQUIREMENTS

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1. 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
2. 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
3. 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
4. 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
5. 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
6. 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
7. 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
8. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Operator shall conduct quarterly gas sampling to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit

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

10. Permittee shall notify the APCO in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rule 2080] Federally Enforceable Through Title V Permit
11. This tank shall be degassed by restricting the outflow of water and floating off the oil pad, such that at least 90 percent of the tank volume is displaced. [District Rule 4623] Federally Enforceable Through Title V Permit
12. During tank degassing, the operator shall discharge or displace organic vapors contained in the tank vapor space to an APCO-approved vapor recovery system. [District Rule 2080] Federally Enforceable Through Title V Permit
13. To facilitate connection to an external APCO-approved recovery system, a suitable tank fitting, such as a manway, may be temporarily removed for a period of time not to exceed 1 hour. [District Rule 2080] Federally Enforceable Through Title V Permit
14. After a tank has been degassed pursuant to the requirements of this permit, vapor control requirements are not applicable until an organic liquid having a TVP of 0.5 psia or greater is placed, held, or stored in this tank. [District Rule 2080] Federally Enforceable Through Title V Permit
15. While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 degrees F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 2080] Federally Enforceable Through Title V Permit
16. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 2080] Federally Enforceable Through Title V Permit
17. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1327-218-1

**EXPIRATION DATE:** 02/28/2017

**SECTION:** 15 **TOWNSHIP:** 27S **RANGE:** 19E

**EQUIPMENT DESCRIPTION:**

560 BBL FWKO VESSEL VENTED TO THE VAPOR RECOVERY SYSTEM LISTED ON S-1327-42

## PERMIT UNIT REQUIREMENTS

1. 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
2. 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
3. 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
4. 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
5. 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
6. 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
7. 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
8. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Operator shall conduct quarterly gas sampling to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit

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

10. Permittee shall notify the APCO in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rule 2080] Federally Enforceable Through Title V Permit
11. This tank shall be degassed by restricting the outflow of water and floating off the oil pad, such that at least 90 percent of the tank volume is displaced. [District Rule 4623] Federally Enforceable Through Title V Permit
12. During tank degassing, the operator shall discharge or displace organic vapors contained in the tank vapor space to an APCO-approved vapor recovery system. [District Rule 2080] Federally Enforceable Through Title V Permit
13. To facilitate connection to an external APCO-approved recovery system, a suitable tank fitting, such as a manway, may be temporarily removed for a period of time not to exceed 1 hour. [District Rule 2080] Federally Enforceable Through Title V Permit
14. After a tank has been degassed pursuant to the requirements of this permit, vapor control requirements are not applicable until an organic liquid having a TVP of 0.5 psia or greater is placed, held, or stored in this tank. [District Rule 2080] Federally Enforceable Through Title V Permit
15. While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 degrees F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 2080] Federally Enforceable Through Title V Permit
16. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 2080] Federally Enforceable Through Title V Permit
17. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

**ATTACHMENT B**  
Current Title V Operating Permit  
S-1327-42-8



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1327-42-8

**EXPIRATION DATE:** 02/28/2017

**SECTION:** 15 **TOWNSHIP:** 27S **RANGE:** 19E

## **EQUIPMENT DESCRIPTION:**

TEOR OPERATION WVC SYSTEM INCLUDING 100 STEAM DRIVE WELLS, HEAT EXCHANGER (OPTIONAL), GAS/LIQUID SEPARATOR, VACUUM PUMP SKID, SULFUR REMOVAL SYSTEM, AND COMPRESSED VAPOR PIPING TO DISTRICT APPROVED INCINERATION/DISPOSAL DEVICES LISTED ON PERMIT S-1326-32, '-34, '-35 AND 4.58 MMBTU/HR COANDA EFFECT SMOKELESS FLARE WITH NATURAL GAS/PROPANE PILOT

## **PERMIT UNIT REQUIREMENTS**

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1. All components of well vent vapor collection and control systems shall be maintained in good working condition. [District Rule 4401] Federally Enforceable Through Title V Permit
2. Leaks shall be inspected and repaired as specified in Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
3. Total uncontrolled VOC emissions from all well vents shall be reduced by at least 99%. [District Rule 4401] Federally Enforceable Through Title V Permit
4. TEOR operation shall include heat exchanger, gas/liquid separator, vacuum pump skid, and compressed vapor piping with vapors incinerated in steam generators '-32, '-34, '-35, '-71, '-72, and/or flare. [District Rule 2201] Federally Enforceable Through Title V Permit
5. There shall be no leaks in excess of 10,000 ppmv when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
6. 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 1/4 or 5% opacity. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Flare shall be equipped with waste gas volume flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Flare shall be equipped with a heat sensing device to detect the presence of a propane or natural gas pilot flame which is burning at all times when combustible gases are vented to the flare. [District Rule 4311] Federally Enforceable Through Title V Permit
9. Total concentration of sulfur compounds in gas incinerated in incineration devices shall not exceed 4 ppmv. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
10. Maximum amount of waste gas combusted in incineration devices shall not exceed 250 MMBtu/day or 31,025 MMBtu/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Emissions from the flare shall not exceed any of the following (based on total gas combusted): PM-10: 0.008 lb/MMBtu; NOx (as NO2): 0.068 lb/MMBtu; VOC: 0.063 lb/MMBtu; or CO: 0.37 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Maximum VOC content of TEOR operation vapor shall not exceed 10% by weight. [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.

13. Operator shall conduct quarterly sampling of vapor to qualify for exemption from fugitive component counts for components handling vapor with less than 10% VOC by weight. If vapor sampled contains less than 10% VOCs for 8 consecutive quarterly samplings, then sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
14. 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
15. Measured heating value and quantity of gas flared shall be used to determine compliance with heat input limits. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Permittee shall maintain a written record of the VOC content and heating value of the gas sampled. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Permittee shall determine sulfur content of gas flared weekly using ASTM method D3246 or double GC for H<sub>2</sub>S and mercaptans or Draeger tube analysis. Sulfur content of waste gas shall be measured within one day of restarting unit if the unit has not been in use for more than 7 days. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
18. Weekly records of the waste gas sulfur content and daily records of waste gas flow rate shall be maintained, retained on the premises for a period of at least five years, and made available for District inspection on request. [District Rules 2201, 4311, and 4801] Federally Enforceable Through Title V Permit
19. Each quarter in which the flare is operated for three (3) hours or more, the permittee shall perform a visible emissions inspection using either EPA Method 22 or EPA Method 9. [District Rule 2520] Federally Enforceable Through Title V Permit
20. A flame shall be present at all time when combustible gases are vented through the flare. [District Rule 4311] Federally Enforceable Through Title V Permit
21. The outlet shall be equipped with an automatic ignition system, or, shall be operated 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] Federally Enforceable Through Title V Permit
22. 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] Federally Enforceable Through Title V Permit
23. 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] Federally Enforceable Through Title V Permit
24. For flares used during an emergency, record of the duration of flare operation, amount of gas burned, and the nature of the emergency situation. [District Rule 4311] Federally Enforceable Through Title V Permit
25. All records shall be maintained, retained on-site for a minimum of five years, and made available to the APCO, ARB, and EPA upon request. [District Rule 4311] Federally Enforceable Through Title V Permit
26. Permittee shall maintain with the permit a current listing of all steam enhanced wells connected to the casing vent control system and shall make such listing readily available for District inspection upon request. [District Rule 4401]
27. The inspection and re-inspection requirements of Rule 4401 shall not apply to components exclusively handling gas/vapor or liquid with a VOC content of 10% by weight or less. [District Rule 4401]
28. Gas and liquid leaks are as defined in Section 3.20 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

29. 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] Federally Enforceable Through Title V Permit
30. An operator shall be in violation of this rule if any District inspection demonstrates or if any operator inspection conducted pursuant to Section 5.8 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 5.6.2.1 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] 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 5.8 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 3 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
32. 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 5.6.2 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 5.9 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
33. 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] Federally Enforceable Through Title V Permit
34. 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] Federally Enforceable Through Title V Permit
35. 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] Federally Enforceable Through Title V Permit
36. 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 5.9.2.3 of Rule 4401, or the component is found to be in compliance with the requirements of this rule. [District Rule 4401] Federally Enforceable Through Title V Permit
37. 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] Federally Enforceable Through Title V Permit
38. Except for leaking critical components or leaking essential components subject to the requirements of Section 5.9.7 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] 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.

39. 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] Federally Enforceable Through Title V Permit
40. 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] Federally Enforceable Through Title V Permit
41. 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] Federally Enforceable Through Title V Permit
42. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401] Federally Enforceable Through Title V Permit
43. 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] Federally Enforceable Through Title V Permit
44. Operator of any steam-enhanced crude oil production well shall keep an inspection log maintained pursuant to Section 6.4 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
45. 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] Federally Enforceable Through Title V Permit
46. 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] Federally Enforceable Through Title V Permit
47. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401] Federally Enforceable Through Title V Permit
48. Operator shall submit to the APCO not later than June 14, 2007 a list of all gauge tanks, as defined in Section 3.17. The list shall contain the size, identification number, the location of each gauge tank and specify whether the gauge tank is upstream of all front line production equipment. [District Rule 4401] Federally Enforceable Through Title V Permit
49. The results of gauge tank TVP testing conducted pursuant to Section 6.2.5 shall be submitted to the APCO within 60 days after the completion of the testing. [District Rule 4401] Federally Enforceable Through Title V Permit
50. 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] Federally Enforceable Through Title V Permit
51. 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] 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.

52. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401] Federally Enforceable Through Title V Permit
53. Operator shall maintain an inspection log in which an operator records, at a minimum, all of the following information for each inspection performed: The total number of components inspected, total number and percentage of leaking components found by component type, location, type, and name or description of each leaking component and description of any unit where the leaking component is found, date of leak detection and the method of leak detection. For gaseous leaks, the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak. the date of repair, replacement, or removal from operation of leaking components, identify and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier, methods used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier, the date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced, the inspector's name, business mailing address, and business telephone number, date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401] Federally Enforceable Through Title V Permit

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



# ATTACHMENT C

Authority to Construct Permits  
S-1327-42-10, '217-0 and '218-0





## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-1327-42-10

**ISSUANCE DATE:** 12/30/2014

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

**LOCATION:** HEAVY OIL WESTERN, KERN COUNTY  
CA

**SECTION:** 15 **TOWNSHIP:** 27S **RANGE:** 19E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF TEOR OPERATION WVC SYSTEM INCLUDING 100 STEAM DRIVE WELLS, HEAT EXCHANGER (OPTIONAL), GAS/LIQUID SEPARATOR, VACUUM PUMP SKID, SULFUR REMOVAL SYSTEM, AND COMPRESSED VAPOR PIPING TO DISTRICT APPROVED INCINERATION/DISPOSAL DEVICES LISTED ON PERMIT S-1326-32, '-34, '-35 AND 4.58 MMBTU/HR COANDA EFFECT SMOKELESS FLARE WITH NATURAL GAS/PROPANE PILOT: CONNECT HEATER TREATER S-1327-217 AND FWKO S-1327-218 TO VAPOR CONTROL SYSTEM

## 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 components of well vent vapor collection and control systems shall be maintained in good working condition. [District Rule 4401] Federally Enforceable Through Title V Permit
3. Leaks shall be inspected and repaired as specified in Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
4. Total uncontrolled VOC emissions from all well vents shall be reduced by at least 99%. [District Rule 4401] Federally Enforceable Through Title V Permit
5. TEOR operation is authorized to receive vapors from heater treater S-1327-217 and FWKO S-1327-218. [District Rule 2201] Federally Enforceable Through Title V Permit
6. TEOR operation shall include heat exchanger, gas/liquid separator, vacuum pump skid, and compressed vapor piping with vapors incinerated in steam generators '-32, '-34, '-35, '-71, '-72, and/or 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-1327-42-10 - Dec 30 2014 12:12PM - TORID - Joint Inspection NOT Required

7. There shall be no leaks in excess of 10,000 ppmv when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
8. 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 1/4 or 5% opacity. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Flare shall be equipped with waste gas volume flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Flare shall be equipped with a heat sensing device to detect the presence of a propane or natural gas pilot flame which is burning at all times when combustible gases are vented to the flare. [District Rule 4311] Federally Enforceable Through Title V Permit
11. Total concentration of sulfur compounds in gas incinerated in incineration devices shall not exceed 4 ppmv. [District Rules 2201 and 4801] Federally Enforceable Through Title V Permit
12. Maximum amount of waste gas combusted in incineration devices shall not exceed 250 MMBtu/day or 31,025 MMBtu/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Emissions from the flare shall not exceed any of the following (based on total gas combusted): PM-10: 0.008 lb/MMBtu; NO<sub>x</sub> (as NO<sub>2</sub>): 0.068 lb/MMBtu; VOC: 0.063 lb/MMBtu; or CO: 0.37 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Maximum VOC content of TEOR operation vapor shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Operator shall conduct quarterly sampling of vapor to qualify for exemption from fugitive component counts for components handling vapor with less than 10% VOC by weight. If vapor sampled contains less than 10% VOCs for 8 consecutive quarterly samplings, then sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
16. 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
17. Measured heating value and quantity of gas flared shall be used to determine compliance with heat input limits. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Permittee shall maintain a written record of the VOC content and heating value of the gas sampled. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Permittee shall determine sulfur content of gas flared weekly using ASTM method D3246 or double GC for H<sub>2</sub>S and mercaptans or Draeger tube analysis. Sulfur content of waste gas shall be measured within one day of restarting unit if the unit has not been in use for more than 7 days. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
20. Weekly records of the waste gas sulfur content and daily records of waste gas flow rate shall be maintained, retained on the premises for a period of at least five years, and made available for District inspection on request. [District Rules 2201, 4311, and 4801] Federally Enforceable Through Title V Permit
21. Each quarter in which the flare is operated for three (3) hours or more, the permittee shall perform a visible emissions inspection using either EPA Method 22 or EPA Method 9. [District Rule 2520] Federally Enforceable Through Title V Permit
22. A flame shall be present at all time when combustible gases are vented through the flare. [District Rule 4311] Federally Enforceable Through Title V Permit
23. The outlet shall be equipped with an automatic ignition system, or, shall be operated 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] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

24. 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] Federally Enforceable Through Title V Permit
25. 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] Federally Enforceable Through Title V Permit
26. For flares used during an emergency, record of the duration of flare operation, amount of gas burned, and the nature of the emergency situation. [District Rule 4311] Federally Enforceable Through Title V Permit
27. All records shall be maintained, retained on-site for a minimum of five years, and made available to the APCO, ARB, and EPA upon request. [District Rule 4311] Federally Enforceable Through Title V Permit
28. Permittee shall maintain with the permit a current listing of all steam enhanced wells connected to the casing vent control system and shall make such listing readily available for District inspection upon request. [District Rule 4401]
29. The inspection and re-inspection requirements of Rule 4401 shall not apply to components exclusively handling gas/vapor or liquid with a VOC content of 10% by weight or less. [District Rule 4401]
30. Gas and liquid leaks are as defined in Section 3.20 of Rule 4401. [District Rule 4401] 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] 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 5.8 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 5.6.2.1 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] 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 5.8 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 3 of Rule 4401. [District Rule 4401] 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 5.6.2 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 5.9 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
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] 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] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

37. 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] Federally Enforceable Through Title V Permit
38. 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 5.9.2.3 of Rule 4401, or the component is found to be in compliance with the requirements of this rule. [District Rule 4401] Federally Enforceable Through Title V Permit
39. 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] Federally Enforceable Through Title V Permit
40. Except for leaking critical components or leaking essential components subject to the requirements of Section 5.9.7 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] Federally Enforceable Through Title V Permit
41. 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] Federally Enforceable Through Title V Permit
42. 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] Federally Enforceable Through Title V Permit
43. 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] Federally Enforceable Through Title V Permit
44. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401] Federally Enforceable Through Title V Permit
45. 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] Federally Enforceable Through Title V Permit
46. Operator of any steam-enhanced crude oil production well shall keep an inspection log maintained pursuant to Section 6.4 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
47. 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] Federally Enforceable Through Title V Permit
48. 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] Federally Enforceable Through Title V Permit
49. Operator shall keep a copy of the APCO-approved Operator Management Plan at the facility. [District Rule 4401] Federally Enforceable Through Title V Permit
50. Operator shall submit to the APCO not later than June 14, 2007 a list of all gauge tanks, as defined in Section 3.17. The list shall contain the size, identification number, the location of each gauge tank and specify whether the gauge tank is upstream of all front line production equipment. [District Rule 4401] Federally Enforceable Through Title V Permit

51. The results of gauge tank TVP testing conducted pursuant to Section 6.2.5 shall be submitted to the APCO within 60 days after the completion of the testing. [District Rule 4401] Federally Enforceable Through Title V Permit
52. 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] Federally Enforceable Through Title V Permit
53. 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] Federally Enforceable Through Title V Permit
54. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401] Federally Enforceable Through Title V Permit
55. Operator shall maintain an inspection log in which an operator records, at a minimum, all of the following information for each inspection performed: The total number of components inspected, total number and percentage of leaking components found by component type, location, type, and name or description of each leaking component and description of any unit where the leaking component is found, date of leak detection and the method of leak detection. For gaseous leaks, the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak. the date of repair, replacement, or removal from operation of leaking components, identify and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier, methods used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier, the date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced, the inspector's name, business mailing address, and business telephone number, date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401] Federally Enforceable Through Title V Permit



**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT



**HEALTHY AIR LIVING™**

## AUTHORITY TO CONSTRUCT

PERMIT NO: S-1327-217-0

ISSUANCE DATE: 12/30/2014

LEGAL OWNER OR OPERATOR: VINTAGE PRODUCTION CALIFORNIA LLC

MAILING ADDRESS: 9600 MING AVE, SUITE 300  
BAKERSFIELD, CA 93311

LOCATION: HEAVY OIL WESTERN, KERN COUNTY  
CA

SECTION: 15 TOWNSHIP: 27S RANGE: 19E

**EQUIPMENT DESCRIPTION:**

460 BBL HEATER TREATER WITH PERMIT-EXEMPT BURNERS (S-1327-PEER-4) VENTED TO THE VAPOR RECOVERY SYSTEM LISTED ON S-1327-42

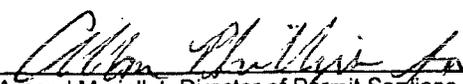
### CONDITIONS

1. ATC S-1327-42-10 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
2. 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
3. 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
4. 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
5. 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

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-1327-217-0 - Dec 30 2014 12:12PM - TORID : Joint Inspection NOT Required

6. 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
7. 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
8. 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
9. 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
10. The VOC content of the gas shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Operator shall conduct quarterly gas sampling to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Permittee shall notify the APCO in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rule 2080] Federally Enforceable Through Title V Permit
13. This tank shall be degassed by restricting the outflow of water and floating off the oil pad, such that at least 90 percent of the tank volume is displaced. [District Rule 4623] Federally Enforceable Through Title V Permit
14. During tank degassing, the operator shall discharge or displace organic vapors contained in the tank vapor space to an APCO-approved vapor recovery system. [District Rule 2080] Federally Enforceable Through Title V Permit
15. To facilitate connection to an external APCO-approved recovery system, a suitable tank fitting, such as a manway, may be temporarily removed for a period of time not to exceed 1 hour. [District Rule 2080] Federally Enforceable Through Title V Permit
16. After a tank has been degassed pursuant to the requirements of this permit, vapor control requirements are not applicable until an organic liquid having a TVP of 0.5 psia or greater is placed, held, or stored in this tank. [District Rule 2080] Federally Enforceable Through Title V Permit
17. While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 degrees F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 2080] Federally Enforceable Through Title V Permit
18. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 2080] Federally Enforceable Through Title V Permit
19. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit



**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT



## AUTHORITY TO CONSTRUCT

PERMIT NO: S-1327-218-0

ISSUANCE DATE: 12/30/2014

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

LOCATION: HEAVY OIL WESTERN, KERN COUNTY  
CA

SECTION: 15 TOWNSHIP: 27S RANGE: 19E

EQUIPMENT DESCRIPTION:  
560 BBL FWKO VESSEL VENTED TO THE VAPOR RECOVERY SYSTEM LISTED ON S-1327-42

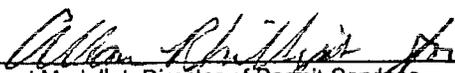
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Seyed Sadredin, Executive Director / APCO

  
Arnaud Marjollet, Director of Permit Services  
S-1327-218-0 : Dec 30 2014 12:12PM - TORID : Joint Inspection NOT Required

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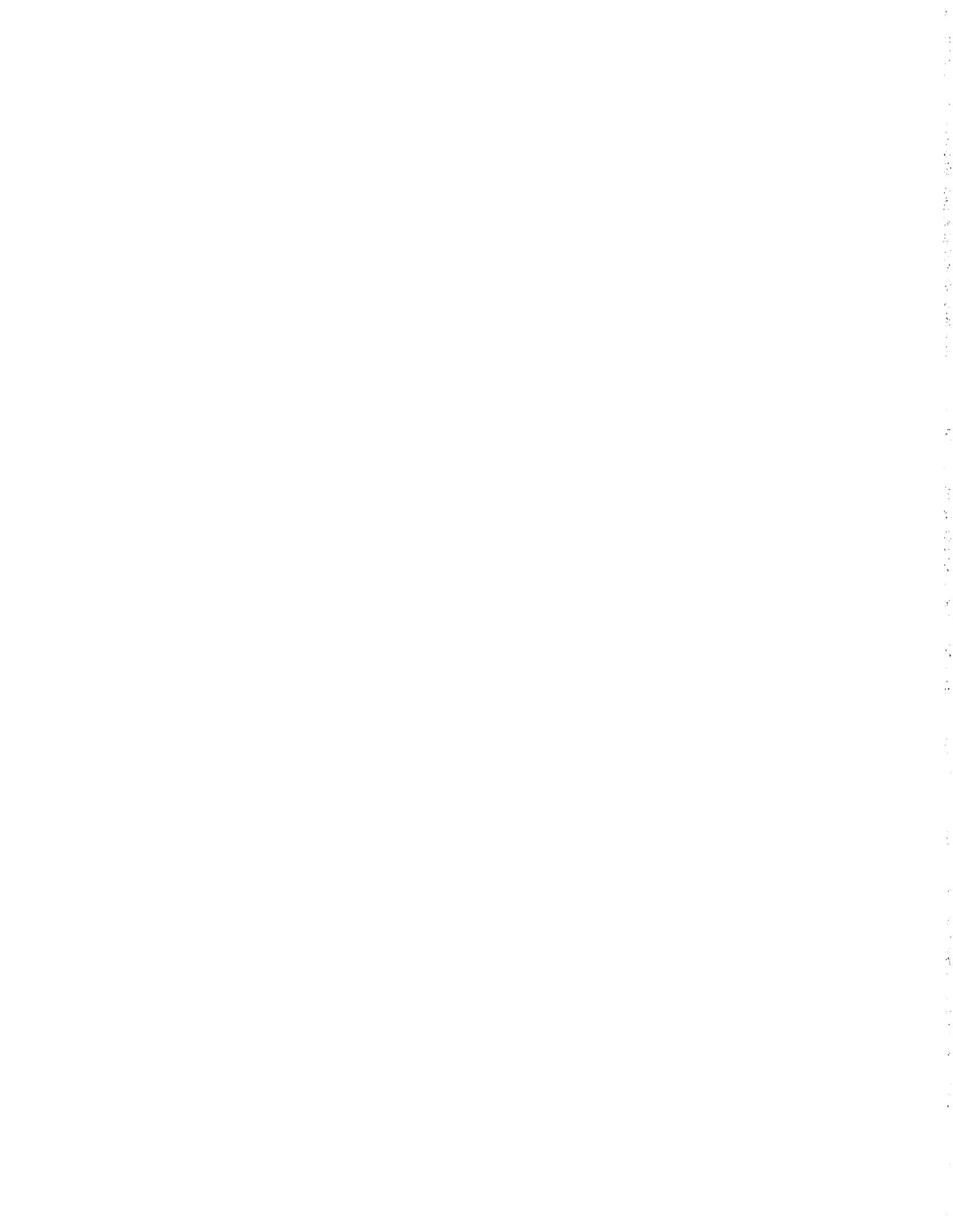
# ATTACHMENT D

## Emission Increases

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

# ATTACHMENT E

## Application





RECEIVED

**MAR 04 2015**

**SJVAPCD  
Southern Region**

March 2, 2015

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

**Subject: Title V Minor Modification S-1327**

Dear Mr. Scandura:

Please find enclosed a Title V Minor Modification application to incorporate ATCs S-1327-42-10, -217-0, and -218-0 into the current Title V operating permit for the California Resources Production Corporation (CRPC) Heavy Oil Western stationary source (S-1327).

If you have any questions or comments please contact me at (661) 869-8000.

Sincerely,

Jerry Frost  
HSE Advisor  
California Resources Corporation (CRC)  
Thermal Operations  
(661) 412-5309 office  
(661) 246-7581 cell  
[Jerry.Frost@crc.com](mailto:Jerry.Frost@crc.com)

Attachments

# San Joaquin Valley Air Pollution Control District

www.valleyair.org

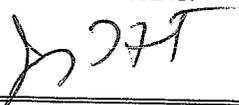
## Permit Application For:

ADMINISTRATIVE  
AMENDMENT

MINOR  
MODIFICATION

SIGNIFICANT  
MODIFICATION **SJVAPCD  
Southern Region**

**MAR 04 2015**

1. PERMIT TO BE ISSUED TO: California Resources Production Corporation	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>9600 Ming Ave</u> CITY: <u>Bakersfield</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93311</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: _____ CITY: _____ <u>NE</u> ¼ SECTION <u>11</u> TOWNSHIP <u>26S</u> RANGE <u>20E</u>	INSTALLATION DATE: July 2014
4. GENERAL NATURE OF BUSINESS: <u>Crude Oil Production</u>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)  Title V Minor Modification to incorporate ATC S-1327-42-10, -217-0 and -218-0 as PTOs into the current Title V operating permit for S-1327.	
6. TYPE OR PRINT NAME OF APPLICANT: <u>Jerry Frost</u>	TITLE OF APPLICANT: <u>HES Advisor</u>
7. SIGNATURE OF APPLICANT: 	DATE: <u>3-2-15</u> PHONE: (661) 869-8000 FAX: (661) 869-8059 EMAIL: <u>Jerry.Frost@crc.com</u>

**For APCD Use Only:**

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
PROJECT NO: <u>S-1151110</u>	FACILITY ID: <u>S-1327</u>

San Joaquin Valley  
Unified Air Pollution Control District

MAR 04 2015  
SJVAPCD  
Southern Region

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

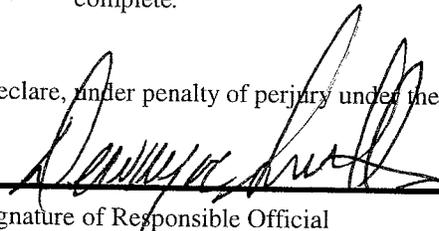
- SIGNIFICANT PERMIT MODIFICATION                       ADMINISTRATIVE  
 MINOR PERMIT MODIFICATION                                       AMENDMENT

COMPANY NAME: CALIFORNIA RESOURCES PRODUCTION CORPORATION	FACILITY ID: S - 1327
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:	
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

3-3-15  
\_\_\_\_\_  
Date

Dewayne Smith  
\_\_\_\_\_  
Name of Responsible Official (please print)  
  
Surface Operations Manager  
\_\_\_\_\_

