

May 25, 2023

Mr. Lance Ericksen
Chevron USA, Inc
PO Box 1392
Bakersfield, CA 93302

Re: Notice of Final Action - Title V Permit Renewal
Facility Number: S-1129
Project Number: S-1212889

Dear Mr. Ericksen:

The District has issued the Final Renewed Title V Permit for Chevron USA, Inc (see enclosure). The preliminary decision for this project was made on February 27, 2023. All comments received during the preliminary decision for this project have been addressed by the District. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Title V Permit will be posted on the District's website (www.valleyair.org).

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Nick Peirce, Permit Services Manager, at (209) 557-6400.

Sincerely,



Brian Clements
Director of Permit Services

Enclosures

cc: Courtney Graham, CARB (w/enclosure) via email
cc: Gerardo Rios, EPA (w/enclosure) via EPS

Samir Sheikh
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95358-8718
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**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT**

**Final Title V Permit Renewal Evaluation
Chevron USA, Inc.
S-1129**

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TITLE V PERMIT RENEWAL EVALUATION

Oil and Gas Production Facility

Engineer: Anne Murphy
Date: April 24, 2023

Facility Number: S-1129
Facility Name: Chevron USA, Inc.
Mailing Address: PO Box 1392
Bakersfield, CA 93302

Contact Name: Lance Eriksen
Phone: (669) 599 - 7295

Responsible Official: Molly Laegeler
Title: Vice President

Project # : S-1212889
Deemed Complete: August 30, 2021

I. PROPOSAL

Chevron USA, Inc. was issued their last renewed Title V permit on July 24, 2017. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the last renewed Title V permit.

The purpose of this evaluation is to provide the legal and factual basis for all updated applicable requirements and to determine if the facility will comply with these updated requirements. It also specifically identifies all additions, deletions, and/or changes made to permit conditions or equipment descriptions.

II. FACILITY LOCATION

Chevron USA, Inc. is located within the Heavy Oil Western Stationary Source in Kern County, CA.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is included as Attachment C.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant does not propose to use any model general permit templates.

V. SCOPE OF EPA AND PUBLIC REVIEW

The applicant is not requesting any model general permit templates. Therefore, all federally enforceable conditions in this current Title V permit will be subject to EPA and public review.

VI. FEDERALLY ENFORCEABLE REQUIREMENTS

A. Rules Updated or Evaluated

- District Rule 1081, Source Sampling (amended December 16, 1993)
- District Rule 2201, New and Modified Stationary Source Review Rule (amended February 18, 2016 ⇒ amended August 15, 2019)
- District Rule 2520, Federally Mandated Operating Permits (amended June 21, 2001 ⇒ amended August 15, 2019)
- District Rule 4311, Flares (amended June 18, 2009 – SIP version ⇒ amended December 17, 2020 – non-SIP version)
- District Rule 4407, In-Situ Combustion Well Vents (amended May 19, 1994)
- District Rule 4601, Architectural Coatings (amended December 17, 2009 ⇒ amended April 16, 2020 – SIP approved on December 14, 2022)
- 40 CFR Part 64 - Compliance Assurance Monitoring (CAM) (amended October 22, 1997)
- 40 CFR Part 68 – Chemical Accident Prevention Provisions (amended December 19, 2019)

- 40 CFR Part 82, Subpart B - Servicing of Motor Vehicle Air Conditioners (amended June 25, 2013 ⇒ amended March 24, 2021)¹
- 40 CFR Part 82, Subpart F - Recycling and Emissions Reduction (amended June 25, 2013 ⇒ amended April 10, 2020)²

B. Rules Removed

- Fresno County Rule 110, Equipment Breakdown (SIP approved August 8, 1977 ⇒ District resolution to rescind from SIP February 17, 2022)
- Kern County Rule 111, Equipment Breakdown (SIP approved October 24, 1980 ⇒ District resolution to rescind from SIP February 17, 2022)
- Kings County Rule 111, Equipment Breakdown (SIP approved June 18, 1982 ⇒ District resolution to rescind from SIP 2/17/2022)
- Madera County Rule 113, Equipment Breakdown (SIP approved November 18, 1983 ⇒ District resolution to rescind from SIP February 17, 2022)
- Merced County Rule 109, Equipment Breakdown (SIP approved June 18, 1982 ⇒ District resolution to rescind from SIP February 17, 2022)
- San Joaquin County Rule 110, Equipment Breakdown (SIP approved December 5, 1984 ⇒ District resolution to rescind from SIP February 17, 2022)
- Stanislaus County Rule 110, Equipment Breakdown (SIP approved 6/1/1983 ⇒ District resolution to rescind from SIP February 17, 2022)
- Tulare County Rule 111, Equipment Breakdown (SIP approved August 22, 1997 ⇒ District resolution to rescind from SIP February 17, 2022)

C. Rules Added

There are no applicable rules that were added since the last Title V renewal.

¹ This subpart has been amended since the last renewal TV permit was issued. However, the amendments to this subpart do not have any effect on existing permit requirements as addressed by condition 28 of permit unit S-1129-0-5 on the draft renewed permit. Therefore, this subpart will not be discussed in further detail.

² This subpart has been amended since the last renewal TV permit was issued. However, the amendments to this subpart do not have any effect on existing permit requirements as addressed by condition 27 of permit unit S-1129-0-5 on the draft renewed permit. Therefore, this subpart will not be discussed in further detail.

D. Rules Not Updated

- District Rule 1070, Inspections (amended December 17, 1992)
- District Rule 1080, Stack Monitoring (amended December 17, 1992)
- District Rule 1160, Emission Statements (amended November 18, 1992 – SIP approved on February 12, 2019)
- District Rule 2010, Permits Required (amended December 17, 1992)
- District Rule 2020, Exemptions (amended December 18, 2014)
- District Rule 2031, Transfer of Permits (amended December 17, 1992)
- District Rule 2070, Standards for Granting Applications (amended December 17, 1992)
- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 2410, Prevention of Significant Deterioration (adopted June 16, 2011 and became effective November 26, 2012)
- District Rule 4101, Visible Emissions (amended February 17, 2005)
- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)
- District Rule 4401, Steam-Enhanced Crude Oil Production Wells (amended June 16, 2011)
- District Rule 4801, Sulfur Compounds (amended December 17, 1992)
- District Rule 8011, General Requirements (amended August 19, 2004)
- District Rule 8021, Construction, Demolition, Excavation, Extraction and Other Earthmoving Activities (amended August 19, 2004)
- District Rule 8031, Bulk Materials (amended August 19, 2004)
- District Rule 8041, Carryout and Trackout (amended August 19, 2004)

- District Rule 8051, Open Areas (amended August 19, 2004)
- District Rule 8061, Paved and Unpaved Roads (amended August 19, 2004)
- District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas (amended September 16, 2004)
- 40 CFR Part 61, Subpart M - National Emission Standard for Asbestos (amended July 20, 2004)

VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the federally enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as "Federally Enforceable Through Title V Permit".

For this facility, the following are not federally enforceable and will not be discussed in further detail:

A. Rules Added/Updated

No rules were updated or removed since the last Title V permit renewal was issued for this facility.

B. Rules Not Updated

- District Rule 1100, Equipment Breakdown (amended December 17, 1992) (Non SIP replacement for Kern County Rule 111, which the District requested to be rescinded from the SIP on February 17, 2022)

District Rule 1100 defines a breakdown condition and the procedures to follow if one occurs. The corrective action, the issuance of an emergency variance, and the reporting requirements are also specified.

District Rule 1100 was last amended on December 17, 1992 and is not included in the SIP; however, the requirements of District Rule 1100 were previously federally enforceable through Kern County Rule 111. Kern County Rule 111 was incorporated into the SIP on October 24, 1980.

On January 12, 2022, EPA issued an updated SIP call directing state and local agencies to remove rules governing emissions associated with startup, shutdown, and malfunction events from their SIPs. The EPA SIP call included

a timeline to address this issue, which was effective February 11, 2022. In accordance with the EPA SIP call, on February 17, 2022, the District approved the submittal of a formal request to EPA and the California Air Resources Board (ARB) to withdraw the following Equipment Breakdown rules from the San Joaquin Valley's SIP: Fresno County Rule 110, Kern County Rule 111, Kings County Rule 111, Madera County Rule 113, Stanislaus County Rule 110, and Tulare County Rule 111.

As a result of the District's formal request to remove Kern County Rule 111 from the SIP, conditions 1 and 2 of the proposed requirements of the facility-wide permit S-1129-0-5, which reference District Rule 1100 and were federally enforceable through Kern County Rule 111, are no longer federally enforceable. In addition, reference to the permit shield for District Rule 1100 was removed from the proposed requirements of the facility-wide permit S-1129-0-5. Condition 11 of the proposed requirements of the facility-wide permit S-1129-0-5, which requires reporting of deviations from permit conditions and references District Rules 1100 and 2520, remains federally enforceable through District Rule 2520.

The following conditions are based solely on this rule and are therefore not federally enforceable through Title V.

Permit Unit #	Permit Description	Condition #s
S-1129-0-5	Facility-Wide Permit	1 & 2

As discussed above, the following conditions are based on this rule and other federally enforceable requirements. Therefore, the conditions are federally enforceable, but is not federally enforceable through this rule:

Permit Unit #	Permit Description	Condition #
S-1129-0-5	Facility-Wide Permit	11, 40

- District Rule 2040, Applications (amended December 17, 1992 ⇒ removed from SIP December 16, 2004, 69 FR 67062)

The purpose of this rule is to explain the procedures for filing, denying, and appealing the denial of applications for a District Authority to Construct (ATC) or Permit to Operate.

The following condition is based solely on this rule and is therefore not federally enforceable through Title V.

Permit Unit #	Permit Description	Condition #
S-1129-0-5	Facility-Wide Permit	7

- District Rule 4102, Nuisance (as amended December 17, 1992)

The purpose of this rule is to protect the health and safety of the public. This rule stipulates that a person shall not discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such person or the public or which cause or have a natural tendency to cause injury or damage to business or property.

The following condition is based solely on this rule and is therefore not federally enforceable through Title V.

Permit Unit #	Permit Description	Condition #s
S-1129-0-5	Facility-Wide Permit	41

VIII. PERMIT REQUIREMENTS

The purpose of this evaluation is to review changes to federally enforceable requirements; therefore, this compliance section will only address rules that have been amended or added since the issuance of the initial Title V permit or most recent renewal of the Title V permit.

A. District Fresno County Rule 110, Kern County Rule 111, Kings County Rule 111, Madera County Rule 113, Merced County Rule 109, San Joaquin County Rule 110 Stanislaus County Rule 110, and Tulare County Rule 111 – Equipment Breakdown

In accordance with EPA's State Implementation Plan (SIP) Call, on February 17, 2022, the District rescinded Fresno County Rule 110, Kern County Rule 111, Kings County Rule 111, Madera County Rule 113, Merced County Rule 109, San Joaquin County Rule 110, Stanislaus County Rule 110, and Tulare County Rule 111 from the San Joaquin Valley SIP.

The following conditions are no longer Federally Enforceable.

Permit Unit #	Permit Description	Condition #s
S-1129-0-5	Facility-Wide Permit	1-2

Additionally all references made to the county rules listed above have been removed from the following conditions.

Permit Unit #	Permit Description	Condition #s
S-1129-0-5	Facility-Wide Permit	1-2, 39

B. District Rule 1081 - Source Sampling (amended December 16, 1993)

District Rule 1081 has not been amended since this facility's initial Title V permit was issued. However, in order maintain consistency between the current permits at this facility, the follow condition based on this rule was added to permit unit S-1129-864-14.

Permit Unit #	Permit Description	Condition #s
S-1129-864-14	200 TEOR Wells	2

C. District Rule 2201 - New and Modified Stationary Source Review Rule (NSR)

District Rule 2201 has been amended since this facility's initial Title V permit was issued. However, the requirements of this rule are only triggered at the time the source undergoes a modification. All applicable requirements from any NSR permit actions have already been incorporated into the current Title V permit. Therefore, the updated requirements of this rule are not applicable at this time.

D. District Rule 2520 - Federally Mandated Operating Permits

District Rule 2520 has been amended since this facility's last Title V permit renewal. However, the amendments to this rule were administrative, relating only to the notification procedures for Title V permit modifications that are required to go through a public notice. The amendments to this rule did not have any effect on the current permit requirements and will therefore not be addressed further in this evaluation. However, greenhouse gas emissions will be addressed under Rule 2520 during this renewal.

Greenhouse Gas Discussion

There are no federally applicable Greenhouse Gas (GHG) requirements for this source. It should be noted that the Mandatory Greenhouse Gas Reporting rule (40 CFR Part 98) is not included in the definition of an applicable requirement within Title V (per 40 CFR 71.2). Therefore, there will be no further discussion of GHG in this evaluation.

E. District Rule 4311, Flares

District Rule 4311 was amended on December 17, 2020. The purpose of this rule to limit the emissions of volatile organic compounds (VOC), oxides of nitrogen (NO_x), and sulfur oxides (SO_x) from the operation of flares. This rule is applicable to operations involving the use of flares.

Per correspondence received on December 20, 2022, the facility has stated that the 0.9 MMBtu/hr Sur-Lite Model 20 SLF 20 enclosed flare operating under S-1129-385 will be removed from service prior to the compliance deadline, December 31, 2023 of the latest amended Rule 4311 requirements (reference District Authority to Construct project S-1224754). Therefore, the amended Rule 4311 requirements will not be addressed as a part of this renewal project. The existing Rule 4311 requirements will remain on the renewed Title V permit until such a time that the ATC under project S-1224754 is implemented and the flare has been removed from service.

F. District Rule 4407, In-Situ Combustion Well

District Rule 4407 has not been amended since this facility's initial Title V permit was issued. However, in order maintain consistency between the current permits at this facility, the follow condition based on this rule was added to permit unit S-1129-864-14.

Permit Unit #	Permit Description	Condition #s
S-1129-864-14	200 TEOR Wells	1

G. District Rule 4601, Architectural Coatings

District Rule 4601 was last amended on April 16, 2020. EPA approved District Rule 4601 as amended on April 16, 2020 for inclusion in the SIP on December 14, 2022.

The purpose of this rule is to limit VOC emissions from architectural coatings. This rule specifies architectural coatings storage, cleanup, and labeling requirements. This rule is applicable to any person who supplies, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures, blends or repackages any architectural coating. This rule is applicable to any person who supplies, markets, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures, blends or repackages any architectural coating for use within the San Joaquin Valley Air Pollution Control District.

As required by a September 2016 decision by the U.S. Court of Appeals for the Ninth Circuit in *Bahr v. U.S. Environmental Protection Agency*,³ the April 16, 2020 amendments to District Rule 4601 added a contingency measure for the District's 2016 Ozone Plan that would remove the exemption for specific categories of coatings sold in small containers with a volume of one liter or less if EPA issues a finding that the San Joaquin Valley Air Basin has failed to attain, or to make reasonable further progress towards attainment of, the 2008 National Ambient Air Quality Standard (NAAQS) for ozone. The April 16, 2020 amendments to District Rule 4601 implemented provisions of the 2019 California Air Resources Board (ARB) Suggested Control Measure for Architectural Coatings,⁴ including lowering VOC limits for several categories of architectural coatings, setting VOC limits for three new categories of architectural coatings, and adding new requirements for colorants.

The primary effect of the April 16, 2020 amendments to District Rule 4601 was reducing VOC content limits required for specific categories of coatings and adding VOC content limits for specific categories of colorants. The previous VOC content limits of District Rule 4601 and the VOC content limits of coatings and colorants that became effective on and after January 1, 2022 are summarized below.

Section 5.1 - VOC Content Limits:

Except as provided in Sections 5.2 and 5.3, no person shall: manufacture, blend, or repackage for use within the District; or supply, sell, market or offer for sale within the District; or solicit for application or apply within the District any architectural coating or colorant with a VOC content in excess of the corresponding limit specified in Table 1 or Table 2, after the specified effective date in Table 1 or Table 2. Limits are expressed as VOC Regulatory, thinned to the manufacturer's maximum thinning recommendation, excluding any colorant added to tint bases.

Rule 4601, Table 1 - VOC Content Limits for Coatings¹		
COATING CATEGORY	Previous VOC Limit (g/l)	VOC Limit (g/l) Effective on and after 1/1/2022
Flat Coatings	50	50
Nonflat Coatings	100	50
Specialty Coatings	-	-

³ United States Court of Appeals for the Ninth Circuit (September 12, 2016) *Bahr v. U.S. Environmental Protection Agency*. <https://cdn.ca9.uscourts.gov/datastore/opinions/2016/09/12/14-72327.pdf>

⁴ California Air Resources Board (May 2019) California Air Resources Board (CARB) Suggested Control Measure for Architectural Coatings. https://ww2.arb.ca.gov/sites/default/files/2020-05/10602_scm_final.pdf

Rule 4601, Table 1 - VOC Content Limits for Coatings¹		
COATING CATEGORY	Previous VOC Limit (g/l)	VOC Limit (g/l) Effective on and after 1/1/2022
Aluminum Roof Coatings	400	100
Basement Specialty Coatings	400	400
Bituminous Roof Coatings	50	50
Bituminous Roof Primers	350	350
Bond Breakers	350	350
Building Envelope Coatings	-	50
Concrete Curing Compounds	350	350
Concrete/Masonry Sealers	100	100
Driveway Sealers	50	50
Dry Fog Coatings	150	50
Faux Finishing Coatings	350	350
Fire Resistive Coatings	350	150
Floor Coatings	100	50
Form-Release Compounds	250	100
Graphic Arts Coatings (Sign Paints)	500	500
High Temperature Coatings	420	420
Industrial Maintenance Coatings	250	250
Low Solids Coatings ²	120	120
Magnesite Cement Coatings	450	450
Mastic Texture Coatings	100	100
Metallic Pigmented Coatings	500	500
Multi-Color Coatings	250	250
Pre-Treatment Wash Primers	420	420
Primers, Sealers, and Undercoaters	100	100
Reactive Penetrating Sealers	350	350
Recycled Coatings	250	250
Roof Coatings	50	50
Rust Preventative Coatings	250	250
Shellacs:		
Clear	730	730
Opaque	550	550
Specialty Primers, Sealers, and Undercoaters	100	100
Stains	250	100
Interior Stains		250
Stone Consolidants	450	450
Swimming Pool Coatings	340	340
Tile and Stone Sealers		100
Traffic Marking Coatings	100	100
Tub and Tile Refinish Coatings	420	420
Waterproofing Membranes	250	100
Wood Coatings	275	275

Rule 4601, Table 1 - VOC Content Limits for Coatings ¹		
COATING CATEGORY	Previous VOC Limit (g/l)	VOC Limit (g/l) Effective on and after 1/1/2022
Wood Preservatives	350	350
Zinc-Rich Primers	340	340

1 Limits are expressed as VOC Regulatory (except where noted otherwise), thinned to the manufacturer's maximum thinning recommendation, excluding any colorant added to tint bases.

2 Units are grams of VOC per liter of coating, including water and exempt compounds, in accordance with Section 3.72.

Rule 4601, Table 2 VOC Content Limits for Colorants ¹	
Colorants Added To	VOC Limit (g/l) Effective on and after 1/1/2022
Architectural Coatings, excluding Industrial Maintenance Coatings	50
Solvent Based Industrial Maintenance Coatings	600
Waterborne Industrial Maintenance Coatings	50
Wood Coatings	600

1 Limits are expressed as VOC Regulatory.

The following conditions of the proposed requirements of the facility-wide permit ensure compliance with this rule.

Permit Unit #	Permit Description	Condition #s
S-1129-0-5	Facility-Wide Permit	23-25

H. 40 CFR Part 64 – Compliance Assurance Monitoring (CAM)

40 CFR Part 64 requires Compliance Assurance Monitoring for units that meet the following three criteria:

- 1) the unit must have an emission limit for the pollutant;
- 2) the unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
- 3) the unit must have a pre-control potential to emit of greater than the major source thresholds.

Pollutant	Major Source Threshold (lb/year)
NO _x	20,000
SO _x	140,000
PM ₁₀	140,000

CO	200,000
VOC	20,000

- a. S-1129-385: THERMALLY ENHANCED OIL RECOVERY OPERATION WITH WELL VENT VAPOR COLLECTION PIPING NETWORK AND FLARE SERVING 40 OIL PRODUCTION WELLS (MCKITTRICK OILFIELD)

Section 64.1 defines a control device as equipment, other than inherent process equipment, that is used to destroy or remove air pollutant(s) prior to discharge to the atmosphere. Based on District practice, the vapor control system is “inherent process equipment”, i.e. the vapor control system is used to increase the safe and proper functioning of the tank battery. Such a vapor control system serves to reduce emission of H₂S (a toxic substance) from the tank(s) and to reduce corrosion in the tank(s) vapor space by eliminating the intrusion of ambient air. Inherent process equipment is explicitly excluded from the definition of control device as defined in 40 CFR 64. Therefore, this permit unit is not subject to CAM since vapor control system is a collection system rather than a control device.

- b. S-1129-386: THERMALLY ENHANCED OIL RECOVERY OPERATION WITH WELL VENT VAPOR COLLECTION PIPING NETWORK SERVING 119 STEAM DRIVE WELLS, 1 CYCLIC WELL AND WET LACT SEPARATOR VESSEL/PERMIT S-1129-867 (NORTH MIDWAY)

Section 64.1 defines a control device as equipment, other than inherent process equipment, that is used to destroy or remove air pollutant(s) prior to discharge to the atmosphere. Based on District practice, the vapor control system is “inherent process equipment”, i.e. the vapor control system is used to increase the safe and proper functioning of the tank battery. Such a vapor control system serves to reduce emission of H₂S (a toxic substance) from the tank(s) and to reduce corrosion in the tank(s) vapor space by eliminating the intrusion of ambient air. Inherent process equipment is explicitly excluded from the definition of control device as defined in 40 CFR 64. Therefore, this permit unit is not subject to CAM since vapor control system is a collection system rather than a control device.

- c. S-1129-865: THERMALLY ENHANCED OIL RECOVERY OPERATION WITH A MAXIMUM OF 200 CLOSED CASING VENT STEAM-ENHANCED WELLS AND PRODUCTION FACILITIES INCLUDING AUTOMATIC WELL TEST VESSEL(S), MASTER TRAP VESSEL, COMPRESSOR(S), COOLERS AND CHILLER(S) WITH VAPOR PIPING FROM ' -865 AND ' -866; AND TO TEOR PERMIT S-1128-116

Section 64.1 defines a control device as equipment, other than inherent process equipment, that is used to destroy or remove air pollutant(s) prior to discharge to the atmosphere. Based on District practice, the vapor control system is “inherent process equipment”, i.e. the vapor control system is used to increase the safe and proper functioning of the tank battery. Such a vapor control system serves to reduce emission of H₂S (a toxic substance) from the tank(s) and to reduce corrosion in the tank(s) vapor space by eliminating the intrusion of ambient air. Inherent process equipment is explicitly excluded from the definition of control device as defined in 40 CFR 64. Therefore, this permit unit is not subject to CAM since vapor control system is a collection system rather than a control device.

I. 40 CFR Part 68 - Chemical Accident Prevention Provisions

The purpose of these regulations is to develop a list of regulated substances and thresholds, define the petition process for adding or deleting substances to this list, define the requirements for operators of stationary sources concerning the prevention of accidental releases, and set forth State accidental release prevention programs. These regulations apply to an owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process.

The following condition of the proposed requirements of the facility-wide permit ensure compliance with this rule.

Permit Unit #	Permit Description	Condition #s
S-1129-0-5	Facility-Wide Permit	43

IX. PERMIT SHIELD

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

A. Requirements Addressed by Model General Permit Templates

The applicant does not propose to use any model general permit templates.

B. Requirements not Addressed by Model General Permit Templates

The applicant has not requested any permit shields other than as discussed above.

C. Obsolete Permit Shields From Existing Permit Requirements

There were no obsolete permit shields listed in the existing permit requirements.

X. CALIFORNIA ENVIRONMENTAL QUALITY ACT

The purpose of the Title V permit renewal is to update the permit to ensure that any changes to regulations since the issuance of the initial Title V permit or most recent renewal of the Title V permit are incorporated as permit requirements.

Per the California Environmental Quality Act (CEQA) Statute §21080.24, and CEQA Guidelines §15281, the issuance, modification, amendment, or renewal of any permit by an air pollution control district or air quality management district pursuant to Title V is exempt from CEQA, unless the issuance, modification, amendment, or renewal authorizes a physical or operational change to a source or facility. There will be no physical or operational change to the source or facility nor will the Title V permit renewal authorize a physical or operational change to the source or facility. Therefore, this project, a Title V permit renewal, is subject to a ministerial action that is exempt from CEQA.

XI. PERMIT CONDITIONS

See Attachment A - Final Renewed Title V Operating Permit.

ATTACHMENTS

- A. Final Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Detailed Summary List of Facility Permits
- D. Facility Comments and District Response

ATTACHMENT A

Final Renewed Title V Operating Permit



Facility # S-1129
CHEVRON USA INC
PO BOX 1392
BAKERSFIELD, CA 93302

Notice of Permit Issuance

The enclosed permit unit requirements authorize the operation of the equipment as described. These permit unit requirements supersede any and all previous permits for the specified equipment.* Please insert these documents into the Facility Permit to Operate, and post copies on or near the equipment as required by District Rule 2010.

Please contact any of our Small Business Assistance (SBA) staff at the numbers below if you have any questions:

Modesto:	(209) 557-6446
Fresno:	(559) 230-5888
Bakersfield:	(661) 392-5665

*Failure to comply with the permit unit requirements may result in enforcement action.

Samir Sheikh

Executive Director/Air Pollution Control Officer

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San Joaquin Valley Air Pollution Control District

FACILITY: S-1129-0-5

EXPIRATION DATE: 02/28/2027

FACILITY-WIDE REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1]
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0]
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040]
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

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

23. No person shall: manufacture, blend, or repackage for use within the District; or supply, sell, market or offer for sale within the District; or solicit for application or apply within the District any architectural coating or colorant with a VOC content in excess of the corresponding limit specified in Table 1 or Table 2 of District Rule 4601 (4/16/20), after the specified effective dates in Table 1 or Table 2 of District Rule 4601. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All architectural coating containers and containers of any VOC-containing materials subject to District Rule 4601 (4/16/20) shall be closed when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in District Rule 4601, sections 6.1 and 6.3 (4/16/20). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8021] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8041] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8051] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8061] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8071] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
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36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (4/16/20); 8021 (8/19/04); 8031 (8/19/04); 8041 (8/19/04); 8051 (8/19/04); 8061 (8/19/04); and 8071 (9/16/04). [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. All permits for facilities S-1128, S-1129, S-1141, and S-2592 are included in the Chevron USA, Inc. Heavy Oil Western stationary source. [District Rule 2201] Federally Enforceable Through Title V Permit
43. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
44. For vapor recovery systems connected to tanks with pressure relief valves, operator shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
45. For tanks equipped with pressure relief valves, operator shall inspect pressure relief valves for fugitive leaks annually in accordance with EPA Method 21, with the instrument calibrated with methane. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
46. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin July 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] 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-1129-385-17

EXPIRATION DATE: 02/28/2027

SECTION: SW17 **TOWNSHIP:** 30S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

THERMALLY ENHANCED OIL RECOVERY OPERATION WITH WELL VENT VAPOR COLLECTION PIPING NETWORK AND FLARE SERVING 40 STEAM ENHANCED WELLS (MCKITTRICK OILFIELD)

PERMIT UNIT REQUIREMENTS

1. The crude oil production from wells associated with this permit unit shall not lie within 1000 feet of an air injection well used for in-situ combustion. [District Rule 4407, 2.0, 3.4, and 3.5] Federally Enforceable Through Title V Permit
2. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (as amended December 16, 1993). [District Rule 1081 and Kern County Rule 108.1] Federally Enforceable Through Title V Permit
3. Well casing vents or downstream valves may be closed if wells are producing to tanks equipped with 99% vapor control or if the wells are idle. [District Rules 2201 and 4401] Federally Enforceable Through Title V Permit
4. Fugitive VOC emissions from TEOR system including condensate collection and handling shall not exceed 29.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Fugitive VOC limit listed above does not include components at the well-head up to the point of initial gas/liquid separation, or existing production handling or flow measurement facilities, or shown to be handling produced fluids with an API gravity less than 30 degrees or fluid streams containing more than 50% water (by weight) or with a VOC content of 10% (by weight) or less. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Components to be screened and counted for determining compliance with fugitive VOC limit listed above shall be identified and categorized according to the appropriate fluid types (gas or water/oil) in Table 2-4 of the EPA's "1995 Protocol for Equipment Leak Emission Estimates" (EPA-453/R-95-017) and the following component types: valves, fittings, threaded connections, open-ended lines, pumps, compressors, pressure relief devices, pipes, flanges, process drains, sealing mechanisms, hatches, sight-glasses, meters, or seal fluid systems. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The VOC content of the casing gas shall not exceed 25% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Maximum amount of gas combusted in flare shall not exceed 21.6 MMBtu/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Emissions from the flare shall not exceed any of the following limits (based on total gas combusted): NOx (as NO2): 0.068 lb/MMBtu; PM10: 0.008 lb/MMBtu; CO: 0.37 lb/MMBtu; or VOC: 0.063 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Sulfur emissions from flare shall not exceed 49.4 lb SO2/day. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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11. Operator shall conduct quarterly sampling of the well casing gas. If the gas sampled is 25% or less VOC by weight for eight consecutive quarterly samplings, the sampling frequency shall only be required annually. If a test shows noncompliance with the percent VOC requirement, the source must return to quarterly testing until eight consecutive quarters show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The higher heating value of the flared gas shall be monitored at least quarterly. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
13. Measured heating value and quantity of gas flared shall be used to determine compliance with heat input limit. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The flare shall be operated according to the manufacturer's specifications, a copy of which shall be maintained on site. [District Rule 2520] Federally Enforceable Through Title V Permit
15. Operation shall include condenser vessel, air-cooled heat exchanger, 500 barrel condensate vessel and 0.9 MMBtu/hr Sur-Lite Model 20 SLF enclosed flare. [District Rule 2201] Federally Enforceable Through Title V Permit
16. A flame shall be present at all times when combustible gases are vented through the flare. [District Rule 4311] Federally Enforceable Through Title V Permit
17. All vapors from condenser shall be incinerated in flare. [District Rule 2201] Federally Enforceable Through Title V Permit
18. A flame or 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 operational. [District Rule 4311] Federally Enforceable Through Title V Permit
19. Flame temperature of the flare shall be greater than 1200 degrees F or another temperature established during source testing which documents compliance with all emission limits. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Flare shall be equipped with operational fuel meters to measure quantity of PUC quality makeup gas and TEOR gas incinerated. [District Rule 2520] Federally Enforceable Through Title V Permit
21. If the flare is fired on noncertified gaseous fuel (including TEOR gas) and compliance with SO_x emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using EPA Method 11 or 15, ASTM D 1072, D 3031, D 4084, D 3246, D6288, Double GC, or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520] Federally Enforceable Through Title V Permit
22. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source (including TEOR gas) shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume until compliance with the sulfur limits can be demonstrated for 8 consecutive weeks for a fuel source. [District Rule 2520] Federally Enforceable Through Title V Permit
23. Sulfur content of the combusted gas shall be determined using ASTM test methods D-1072, D-3246, D-6228, or double GC for H₂S and Mercaptans. H₂S concentration (ppmv) of the gas shall be determined using ASTM test methods D-1072 or D-4084, using Draeger tube, or by gas supplier test data consistent with the natural gas fuel sulfur content test method listed in this permit. [District Rule 1081] Federally Enforceable Through Title V Permit
24. Source test results shall be submitted to the District within 60 days after collection. [District Rule 1081] Federally Enforceable Through Title V Permit
25. The operator shall maintain a copy of the latest APCO-approved Operator Management Plan (OMP) at the facility and make it available to the APCO, ARB, and US EPA upon request. [District Rule 4401] Federally Enforceable Through Title V Permit
26. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [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.

27. In accordance with the approved OMP, the operator shall meet all applicable operating, inspection and re-inspection, maintenance, component identification, record keeping, and notification requirements of Rule 4401 for all steam enhanced crude oil production wells at this facility except for those wells and components specifically exempted in Section 4.0 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
28. The operator shall maintain an inspection log that has been signed and dated by the facility operator responsible for the inspection, certifying the accuracy of the information recorded in the log. The inspection log shall contain, at a minimum, all of the following information: 1) The total number of components inspected, and the total number and percentage of leaking components found by component types; 2) The location, type, name or description of each leaking component and the description of any unit where the leaking component is found; 3) Date of the leak detection and method of the leak detection; 4) For gaseous leaks, record the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak; 5) The date of repair, replacement, or removal from operation of the leaking component(s); 6) The identification and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes first; 7) The method(s) used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier; 8) The date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced; 9) The inspector's name, business mailing address, and business telephone number. [District Rule 4401] Federally Enforceable Through Title V Permit
29. Steam-enhanced crude oil production well vents shall be closed, except when 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, and the front line production equipment downstream of the wells that carry produced fluids be connected to a VOC collection and control system. Alternatively, steam-enhanced crude oil production well vents shall be open and the well vents connected to a VOC collection and control system. [District Rule 4401] Federally Enforceable Through Title V Permit
30. The operator shall be in violation of Rule 4401 if any District inspection, or operator inspection conducted as a requirement of this rule, demonstrates that one or more of the leak standard conditions set forth in section 5.6.2 exists. [District Rule 4401] Federally Enforceable Through Title V Permit
31. There shall not be an open-ended line or a valve located at the end of the line that is not sealed with a blind flange, plug, cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended lines. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401] Federally Enforceable Through Title V Permit
32. For pressure relief devices (PRDs) a major gas leak is greater than 10,000 ppmv and a minor gas leak is from 400 to 10,000 ppmv. For components other than PRDs a major gas leak is greater than 10,000 ppmv and a minor gas leak is from 2,000 to 10,000 ppmv. A major liquid leak is a visible mist or a continuous flow of liquid that is not seal lubricant. A minor liquid leak is a liquid leak, except seal lubricant, that is not a major liquid leak and drips liquid at a rate of more than three drops per minute. Any liquid or gas coming from a component undergoing repair or replacement, or during sampling of process fluid from a component into a container is not considered a leak provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401] Federally Enforceable Through Title V Permit
33. There shall be no components with major liquid leaks or with gas leaks greater than 50,000 ppmv. [District Rule 4401] Federally Enforceable Through Title V Permit
34. There shall not be more minor liquid leaks, minor gas leaks, or gas leaks greater than 10,000 ppmv up to 50,000 ppmv than the following: 3 leaks for 1 - 25 wells, 6 leaks for 26 - 50 wells, 8 leaks for 51 - 100 wells, 10 leaks for 101 - 250 wells, 15 leaks for 251 - 500 wells, and 1 leak for each 20 wells (with a minimum of 50 wells test) for more than 500 wells connected to a VOC collection and control system. [District Rule 4401] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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35. Components that have been found leaking in excess of the applicable leak standards of this rule may be used provided such leaking components have been identified with a tag for repair, are repaired, or are awaiting re-inspection after being repaired, within the applicable time period specified in this permit. [District Rule 4401] Federally Enforceable Through Title V Permit
36. 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 and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401] Federally Enforceable Through Title V Permit
37. Except for pipes and unsafe-to-monitor components, all other components shall be inspected pursuant to the requirements of section 6.3.3 at least once every year. [District Rule 4401] Federally Enforceable Through Title V Permit
38. All pipes shall be visually inspected at least once every year. Any visual inspection of pipes that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected within 24 hours after detecting the leak. If a leak is found, the leak shall be repaired as soon as practicable but not later than as allowed by Rule 4401 and specified in this permit. [District Rule 4401] Federally Enforceable Through Title V Permit
39. The operator shall audio-visually (by hearing and by sight) inspect for leaks all accessible operating pumps, compressors, and PRDs in service at least once each calendar week. [District Rule 4401] Federally Enforceable Through Title V Permit
40. Any audio-visual inspection of an accessible operating pump, compressor, and PRD performed by an operator that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected not later than 24 hours after conducting the audio-visual inspection. If a leak is found, the leak shall be repaired as soon as practicable but not later than as allowed by Rule 4401 and specified in this permit. [District Rule 4401] Federally Enforceable Through Title V Permit
41. The operator shall initially inspect a PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the discovery of the release. The operator shall re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection. [District Rule 4401] Federally Enforceable Through Title V Permit
42. The operator shall inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. The operator shall inspect a component, other than PRDs, that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. The operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401] Federally Enforceable Through Title V Permit
43. A District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. [District Rule 4401] Federally Enforceable Through Title V Permit
44. The operator, upon detection of a leaking component, shall affix to that component a weatherproof, readily visible tag, bearing the date and time when the leak was detected and the date and time of the leak measurement. For gaseous leaks, the tag shall indicate the leak concentration in ppmv. For liquid leaks, the tag shall indicate whether it is a major liquid leak or a minor liquid leak. The tag shall indicate, when applicable, whether the component is an essential component, an unsafe-to-monitor component, or a critical component. The tag shall remain in place until the leaking component is repaired or replaced and reinspected and found to be in compliance with the requirements of this rule. [District Rule 4401] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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45. The operator shall minimize all component leaks immediately, to the extent possible, but not later than one hour after detection of the leak in order to stop or reduce leakage to the atmosphere. Except for leaking critical components or leaking essential components, if the leak has been minimized but the leak still exceeds the applicable leak standards specified in this permit, the operator shall do one of the following within the timeframes specified within this permit: 1) repair or replace the leaking component; 2) vent the leaking component to a closed vent system; 3) or remove the leaking component from operation. A closed vent system is a District approved system that is not open to the atmosphere. It is composed of hard-piping, ductwork connections and, if necessary, flow inducing devices that transport gas or vapor from a piece or pieces of equipment to a District approved control device that has a overall VOC collection and destruction or removal efficiency of at least 99%, or that transports gases or vapors back to a process system. [District Rule 4401] Federally Enforceable Through Title V Permit
46. The operator shall repair minor gas leaks within 14 days, major gas leaks which less than or equal to 50,000 ppmv within 5 days., major gas leaks which are greater than 50,000 ppmv within two days, minor liquid leaks within 3 days, and major liquid leaks within 2 days. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period. The start of the repair period shall be the time of the initial leak detection. [District Rule 4401] Federally Enforceable Through Title V Permit
47. If a leaking component is an essential component or a critical component which cannot be shut down immediately for repairs, and after being minimized still exceeds the applicable leak standard, the operator shall repair or replace the component to eliminate the leak during the next process unit turnaround or no later than one year from the date of original leak detection, which ever is earlier. [District Rule 4401] Federally Enforceable Through Title V Permit
48. 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
49. An operator of any steam-enhanced crude oil production well shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system. [District Rule 4401] Federally Enforceable Through Title V Permit
50. The operator shall maintain copies of training records and of the latest APCO-approved Operator Management Plan (OMP) at the facility and make such available to the APCO, ARB, and US EPA upon request. [District Rule 4401] Federally Enforceable Through Title V Permit
51. The results of periodic gauge tank TVP testing conducted 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. The 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. Except as elsewhere in this permit, the operator shall source test annually all vapor collection and control systems used to control emissions from steam-enhanced crude oil production well vents to determine the control efficiency of the device(s) used for destruction or removal of VOC. Compliance testing shall be performed annually by source testers certified by ARB. Testing shall be performed during June, July, August, or September of each year if the system's control efficiency is dependent upon ambient air temperature. [District Rule 4401] Federally Enforceable Through Title V Permit
54. If approved by EPA, ARB, and the APCO, an operator need not comply with the annual control efficiency testing requirement if all uncondensed VOC emissions collected by the vapor collection and control system are incinerated in fuel burning equipment, an internal combustion engine or in a smokeless flare, or if the vapor collection and control does not have a VOC destruction device. [District Rule 4401] Federally Enforceable Through Title V Permit
55. An operator seeking approval a waiver of the annual control efficiency testing requirement shall submit a written request and supporting information to the APCO. The District shall evaluate the request and if approved by the APCO, the District shall provide EPA and ARB with a copy of the evaluation and shall request EPA and ARB approval. The District evaluation and the APCO request shall be deemed approved unless EPA or ARB objects to such approval in writing within 45 days of the receipt of the APCO request. [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.

56. The operator shall conduct TVP testing of each gauge tank, as defined by Section 3.17 of Rule 4401, at least once every 24 months during summer (July - September), and whenever there is a change in the source or type of produced fluid in the gauge tank. The TVP testing shall be conducted at the actual storage temperature of the produced fluid in the gauge tank using the applicable TVP test method specified in Rule 4623 (Storage of Organic Liquids). [District Rule 4401] Federally Enforceable Through Title V Permit
57. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4401] Federally Enforceable Through Title V Permit
58. VOC content shall be analyzed by using the latest revision of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be performed by using ARB Method 432. [District Rule 4401] Federally Enforceable Through Title V Permit
59. Leak inspection, other than audio-visual, and measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. Where safety is a concern, such as measuring leaks from compressor seals or pump seals when the shaft is rotating, a person shall measure leaks by placing the instrument probe inlet at a distance of one (1) centimeter or less from the surface of the component interface. [District Rule 4401] Federally Enforceable Through Title V Permit
60. 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
61. The operator shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures, as necessary. [District Rule 4401] Federally Enforceable Through Title V Permit
62. The operator shall maintain an APCO approved Operator Management Plan (OMP). The OMP shall include, at a minimum, a description of all wells and all associated VOC collection and control systems subject to this rule, and all wells and all associated VOC collection and control systems that are exempt; an identification and description of any known hazard that might affect the safety of an inspector; except for pipes, the number of components that are subject to this rule by component type; except for pipes, the number and types of major components, inaccessible components, unsafe-to-monitor components, critical components, and essential components that are subject to this rule and the reason(s) for such designation; except for pipes, the location of components subject to the rule (components may be grouped together functionally by process unit or facility description); except for pipes, components exempt pursuant to Section 4.8 (except for components buried below ground) may be described in the OMP by grouping them functionally by process unit or facility description (the results of any laboratory testing or other pertinent information to demonstrate compliance with the applicable exemption criteria for components for which an exemption is being claimed pursuant to Sections 4.8 shall be submitted with the OMP); a detailed schedule of an operator's inspections of components to be conducted as required by this rule and whether the operator inspections of components required by this rule will be performed by a qualified contractor or by an in-house team; a description of the training standards for personnel that inspect and repair components; and a description of the leak detection training for conducting the test method specified in Section 6.3.3 for new operators, and for experienced operators, as necessary. [District Rule 4401] Federally Enforceable Through Title V Permit
63. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements of SJVUAPCD Rules 4201 and 4801; Kern County Rule 407. A permit shield is granted from these requirements. [District Rule 2520] 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.

64. Compliance with permit conditions in the Title V permit shall be deemed compliance with subsumed Kern County Rule 404. A permit shield is granted from this requirement. [District Rule 2520] Federally Enforceable Through Title V Permit
65. Permittee shall maintain records of number and type of fugitive emissions components and calculated fugitive emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
66. Permittee shall keep accurate records of daily heat input to the flare in MMBtu/day. [District Rule 2201] Federally Enforceable Through Title V Permit
67. Permittee shall maintain with this permit a current listing of all steam enhanced wells connected to the casing collection system and shall make such listing readily available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit
68. Daily records of TEOR gas and makeup gas consumed by flare shall be retained on site and shall be made readily available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit
69. Records of leaks detected during annual operator inspections, and each subsequent repair and re-inspection, shall be submitted to the District, ARB, and EPA upon request. [District Rule 4401] Federally Enforceable Through Title V Permit
70. Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components. The records shall include a copy of the current calibration gas certification from the vendor of the calibration gas cylinder, the date of calibration, the concentration of calibration gas, the instrument reading of calibration gas before adjustment, the instrument reading of calibration gas after adjustment, the calibration gas expiration date, and the calibration gas cylinder pressure at the time of calibration. [District Rule 4401] Federally Enforceable Through Title V Permit
71. All records required by this permit shall be maintained and retained for a minimum of five (5) years and made available for District, ARB, and EPA inspection upon request. [District Rule 4401] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1129-864-14

EXPIRATION DATE: 02/28/2027

EQUIPMENT DESCRIPTION:

THERMALLY ENHANCED OIL RECOVERY OPERATION WITH A MAXIMUM OF 200 CLOSED CASING VENT STEAM-ENHANCED WELLS AND PRODUCTION FACILITIES INCLUDING AUTOMATIC WELL TEST VESSEL(S), MASTER TRAP VESSEL, COMPRESSOR(S), COOLERS AND CHILLER(S) WITH VAPOR PIPING FROM '865 AND '866; AND TO TEOR PERMIT S-1128-116

PERMIT UNIT REQUIREMENTS

1. The crude oil production from wells associated with this permit unit shall not lie within 1000 feet of an air injection well used for in-situ combustion. [District Rule 4407, 2.0, 3.4, and 3.5] Federally Enforceable Through Title V Permit
2. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (as amended December 16, 1993). [District Rule 1081 and Kern County Rule 108.1] Federally Enforceable Through Title V Permit
3. Except for pressure relief streams, area drains, and pressure drains, produced fluids shall be routed to gas/liquid separation equipment prior to transfer to storage tank(s). Except for releases from pressure relief valves, vapors separated from fluids produced from any well associated with this operation shall be handled only in closed and/or vapor controlled production equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All vapor and condensate service piping, fittings, and valves dedicated to the vapor recovery system 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 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 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 the 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
5. All vapor and condensate service piping, fittings, and valves dedicated to the vapor recovery system shall be maintained in a gas-tight condition. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background shall be considered a leak. [District Rule 2201] Federally Enforceable Through Title V Permit
6. A facility operator, upon detection of a leaking component, shall affix to that component not immediately repaired 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 permit. [District Rule 2201] Federally Enforceable Through Title V Permit
7. An operator shall reinspect a component for leaks within working 30 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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8. Emissions from components which have been tagged by the facility operator for repair within 15 days or which have been repaired and are awaiting re-inspection shall not be in violation of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
9. All components not excluded from counting shall be identified and categorized according to the following component types: connectors, flanges, open-ended lines (sample connections, drains, bleed valves, etc.) pump seals, valves with visible actuators, polish rod stuffing boxes and other (pressure relief devices, compressor seals, meters, etc.). [District Rule 2201] Federally Enforceable Through Title V Permit
10. Fugitive components in crude oil service shall handle oil with API gravities less than 30 degrees as determined by ASTM Methods D-1298, or D-287 with D-4057. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Operator shall conduct gas sampling at McKittrick MCK-DIA-VOC sample point located between the Master Trap Vessel and the first liquid knockout vessel to qualify for exemption from fugitive component counts for components handling fluids with 10% or less VOC by weight. The testing required by permit S-1129-864 shall be used to demonstrate compliance, which is representative of all components downstream of the first liquid knockout vessel. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Permittee shall demonstrate that any components in condensate service handle fluid streams that contain at least 50% water (by weight). If the components are shown to contain greater than 80% water (by weight), then no further demonstration will be required, otherwise annual analysis will be required. [District Rule 2201] Federally Enforceable Through Title V Permit
13. VOC content shall be tested using methods and procedures approved by the District and conducted under circumstances representative of normal operation. VOC content shall be analyzed using the latest version of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be done using CARB Method 422. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Fugitive VOC emissions from TEOR operation shall not exceed 36.3 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Fugitive VOC limit listed above does not include piping and components exempt from counting including: piping and components handling produced fluids with an API gravity less than 30 degrees, piping and components in water/oil service (water content greater than or equal to 50%), piping and components handling fluids having less than 10% VOC by weight, or existing production handling or flow measurement facilities. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Except for components specified above, permittee shall maintain with the permit accurate counts of fugitive components subject to counting by type and service and resulting emissions calculated using the average emissions factors in the USEPA's 1995 Protocol for Equipment Leak Emission Estimates (EPA-453/R-95-017, Table 2-4). [District Rule 2201] Federally Enforceable Through Title V Permit
17. Permittee shall maintain a current list of all thermally enhanced production wells associated with this operation and accurate records of fugitive inspection component counts of non-exempt components and leak inspection results, and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Permittee shall maintain a current listing of wells with a packer installed and include the label "Packer" on wells with packers. Wells with a packer are not subject to VOC emissions checks. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Permittee shall maintain a written record of VOC content of the gas (sampled not less than annually) and location of sampling point. [District Rule 1070] Federally Enforceable Through Title V Permit
20. Well casing vents or downstream valves may be closed if wells are producing to tanks equipped with 99% vapor control or if the wells are idle. [District Rules 2201 and 4401, 5.4] Federally Enforceable Through Title V Permit
21. The operator shall maintain a copy of the latest APCO-approved Operator Management Plan (OMP) at the facility and make it available to the APCO, ARB, and US EPA upon request. [District Rule 4401, 6.1.8] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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22. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4401, 6.7] Federally Enforceable Through Title V Permit
23. In accordance with the approved OMP, the operator shall meet all applicable operating, inspection and re-inspection, maintenance, component identification, record keeping, and notification requirements of Rule 4401 for all steam enhanced crude oil production wells at this facility except for those wells and components specifically exempted in Section 4.0 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
24. The operator shall maintain an inspection log that has been signed and dated by the facility operator responsible for the inspection, certifying the accuracy of the information recorded in the log. The inspection log shall contain, at a minimum, all of the following information: 1) The total number of components inspected, and the total number and percentage of leaking components found by component types; 2) The location, type, name or description of each leaking component and the description of any unit where the leaking component is found; 3) Date of the leak detection and method of the leak detection; 4) For gaseous leaks, record the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak; 5) The date of repair, replacement, or removal from operation of the leaking component(s); 6) The identification and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes first; 7) The method(s) used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier; 8) The date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced; 9) The inspector's name, business mailing address, and business telephone number. [District Rule 4401, 6.4] Federally Enforceable Through Title V Permit
25. Steam-enhanced crude oil production well vents shall be closed, except when 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, and the front line production equipment downstream of the wells that carry produced fluids be connected to a VOC collection and control system. Alternatively, steam-enhanced crude oil production well vents shall be open and the well vents connected to a VOC collection and control system. [District Rule 4401, 5.5.1] Federally Enforceable Through Title V Permit
26. The operator shall be in violation of Rule 4401 if any District inspection, or operator inspection conducted as a requirement of this rule, demonstrates that one or more of the leak standard conditions set forth in section 5.6.2 exists. [District Rule 4401, 5.6.1] Federally Enforceable Through Title V Permit
27. There shall not be an open-ended line or a valve located at the end of the line that is not sealed with a blind flange, plug, cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended lines. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401, 5.6.2.1] Federally Enforceable Through Title V Permit
28. For pressure relief devices (PRDs) a major gas leak is greater than 10,000 ppmv and a minor gas leak is from 400 to 10,000 ppmv. For components other than PRDs a major gas leak is greater than 10,000 ppmv and a minor gas leak is from 2,000 to 10,000 ppmv. A major liquid leak is a visible mist or a continuous flow of liquid that is not seal lubricant. A minor liquid leak is a liquid leak, except seal lubricant, that is not a major liquid leak and drips liquid at a rate of more than three drops per minute. Any liquid or gas coming from a component undergoing repair or replacement, or during sampling of process fluid from a component into a container is not considered a leak provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401, 3.20] Federally Enforceable Through Title V Permit
29. There shall be no components with major liquid leaks or with gas leaks greater than 50,000 ppmv. [District Rule 4401, 5.6.2.2 and 5.6.2.3] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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30. There shall not be more minor liquid leaks, minor gas leaks, or gas leaks greater than 10,000 ppmv up to 50,000 ppmv than the following: 3 leaks for 1 - 25 wells, 6 leaks for 26 - 50 wells, 8 leaks for 51 - 100 wells, 10 leaks for 101 - 250 wells, 15 leaks for 251 - 500 wells, and 1 leak for each 20 wells (with a minimum of 50 wells test) for more than 500 wells connected to a VOC collection and control system. [District Rule 4401, 5.6.2.4] Federally Enforceable Through Title V Permit
31. Components that have been found leaking in excess of the applicable leak standards of this rule may be used provided such leaking components have been identified with a tag for repair, are repaired, or are awaiting re-inspection after being repaired, within the applicable time period specified in this permit. [District Rule 4401, 5.7.1] Federally Enforceable Through Title V Permit
32. 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 and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401, 5.7.2] Federally Enforceable Through Title V Permit
33. Except for pipes and unsafe-to-monitor components, all other components shall be inspected pursuant to the requirements of section 6.3.3 at least once every year. [District Rule 4401,5.8.1] Federally Enforceable Through Title V Permit
34. All pipes shall be visually inspected at least once every year. Any visual inspection of pipes that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected within 24 hours after detecting the leak. If a leak is found, the leak shall be repaired as soon as practicable but not later than as allowed by Rule 4401 and specified in this permit. [District Rule 4401, 5.8.2] Federally Enforceable Through Title V Permit
35. The operator shall audio-visually (by hearing and by sight) inspect for leaks all accessible operating pumps, compressors, and PRDs in service at least once each calendar week. [District Rule 4401, 5.8.3.1] Federally Enforceable Through Title V Permit
36. Any audio-visual inspection of an accessible operating pump, compressor, and PRD performed by an operator that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected not later than 24 hours after conducting the audio-visual inspection. If a leak is found, the leak shall be repaired as soon as practicable but not later than as allowed by Rule 4401 and specified in this permit. [District Rule 4401, 5.8.3.2] Federally Enforceable Through Title V Permit
37. The operator shall initially inspect a PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the discovery of the release. The operator shall re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection. [District Rule 4401, 5.8.4.1] Federally Enforceable Through Title V Permit
38. The operator shall inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. The operator shall inspect a component, other than PRDs, that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. The operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401, 5.8.4.2, 5.8.4.3, 5.8.5] Federally Enforceable Through Title V Permit
39. A District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. [District Rule 4401, 5.8.6] Federally Enforceable Through Title V Permit
40. The operator, upon detection of a leaking component, shall affix to that component a weatherproof, readily visible tag, bearing the date and time when the leak was detected and the date and time of the leak measurement. For gaseous leaks, the tag shall indicate the leak concentration in ppmv. For liquid leaks, the tag shall indicate whether it is a major liquid leak or a minor liquid leak. The tag shall indicate, when applicable, whether the component is an essential component, an unsafe-to-monitor component, or a critical component. The tag shall remain in place until the leaking component is repaired or replaced and reinspected and found to be in compliance with the requirements of this rule. [District Rule 4401 5.9.1, 5.9.2] Federally Enforceable Through Title V Permit

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41. The operator shall minimize all component leaks immediately, to the extent possible, but not later than one hour after detection of the leak in order to stop or reduce leakage to the atmosphere. Except for leaking critical components or leaking essential components, if the leak has been minimized but the leak still exceeds the applicable leak standards specified in this permit, the operator shall do one of the following within the timeframes specified within this permit: 1) repair or replace the leaking component; 2) vent the leaking component to a closed vent system; 3) or remove the leaking component from operation. A closed vent system is a District approved system that is not open to the atmosphere. It is composed of hard-piping, ductwork connections and, if necessary, flow inducing devices that transport gas or vapor from a piece or pieces of equipment to a District approved control device that has a overall VOC collection and destruction or removal efficiency of at least 99%, or that transports gases or vapors back to a process system. [District Rule 4401, 5.9.3, 5.9.4] Federally Enforceable Through Title V Permit
42. The operator shall repair minor gas leaks within 14 days, major gas leaks which less than or equal to 50,000 ppmv within 5 days., major gas leaks which are greater than 50,000 ppmv within two days, minor liquid leaks within 3 days, and major liquid leaks within 2 days. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period. The start of the repair period shall be the time of the initial leak detection. [District Rule 4401, 5.9.4, 5.9.5, and 5.9.6] Federally Enforceable Through Title V Permit
43. If a leaking component is an essential component or a critical component which cannot be shut down immediately for repairs, and after being minimized still exceeds the applicable leak standard, the operator shall repair or replace the component to eliminate the leak during the next process unit turnaround or no later than one year from the date of original leak detection, which ever is earlier. [District Rule 4401, 5.9.7] 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, 6.1.1] Federally Enforceable Through Title V Permit
45. An operator of any steam-enhanced crude oil production well shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system. [District Rule 4401, 6.1.3] Federally Enforceable Through Title V Permit
46. The operator shall maintain copies of training records and of the latest APCO-approved Operator Management Plan (OMP) at the facility and make such available to the APCO, ARB, and US EPA upon request. [District Rule 4401, 6.1.7, 6.1.8] Federally Enforceable Through Title V Permit
47. The results of periodic gauge tank TVP testing conducted shall be submitted to the APCO within 60 days after the completion of the testing. [District Rule 4401, 6.1.10] Federally Enforceable Through Title V Permit
48. 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. The operator shall submit such information recorded during the calendar year to the APCO no later than 60 days after the end of the calendar year. [District Rule 4401, 6.1.11] Federally Enforceable Through Title V Permit
49. Except as elsewhere in this permit, the operator shall source test annually all vapor collection and control systems used to control emissions from steam-enhanced crude oil production well vents to determine the control efficiency of the device(s) used for destruction or removal of VOC. Compliance testing shall be performed annually by source testers certified by ARB. Testing shall be performed during June, July, August, or September of each year if the system's control efficiency is dependent upon ambient air temperature. [District Rule 4401, 6.2.1] Federally Enforceable Through Title V Permit
50. If approved by EPA, ARB, and the APCO, an operator need not comply with the annual control efficiency testing requirement if all uncondensed VOC emissions collected by the vapor collection and control system are incinerated in fuel burning equipment, an internal combustion engine or in a smokeless flare, or if the vapor collection and control does not have a VOC destruction device. [District Rule 4401, 6.2.2, 6.2.3] 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.

51. An operator seeking approval a waiver of the annual control efficiency testing requirement shall submit a written request and supporting information to the APCO. The District shall evaluate the request and if approved by the APCO, the District shall provide EPA and ARB with a copy of the evaluation and shall request EPA and ARB approval. The District evaluation and the APCO request shall be deemed approved unless EPA or ARB objects to such approval in writing within 45 days of the receipt of the APCO request. [District Rule 4401, 6.2.4] Federally Enforceable Through Title V Permit
52. The operator shall conduct TVP testing of each gauge tank, as defined by Section 3.17 of Rule 4401, at least once every 24 months during summer (July - September), and whenever there is a change in the source or type of produced fluid in the gauge tank. The TVP testing shall be conducted at the actual storage temperature of the produced fluid in the gauge tank using the applicable TVP test method specified in Rule 4623 (Storage of Organic Liquids). [District Rule 4401, 6.2.5] Federally Enforceable Through Title V Permit
53. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4401, 6.3.1] Federally Enforceable Through Title V Permit
54. VOC content shall be analyzed by using the latest revision of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be performed by using ARB Method 432. [District Rule 4401, 6.3.2] Federally Enforceable Through Title V Permit
55. Leak inspection, other than audio-visual, and measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. Where safety is a concern, such as measuring leaks from compressor seals or pump seals when the shaft is rotating, a person shall measure leaks by placing the instrument probe inlet at a distance of one (1) centimeter or less from the surface of the component interface. [District Rule 4401, 6.3.3] Federally Enforceable Through Title V Permit
56. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401, 6.3.5] Federally Enforceable Through Title V Permit
57. The operator shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures, as necessary. [District Rule 4401, 6.5] 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.

58. The operator shall maintain an APCO approved Operator Management Plan (OMP). The OMP shall include, at a minimum, a description of all wells and all associated VOC collection and control systems subject to this rule, and all wells and all associated VOC collection and control systems that are exempt; an identification and description of any known hazard that might affect the safety of an inspector; except for pipes, the number of components that are subject to this rule by component type; except for pipes, the number and types of major components, inaccessible components, unsafe-to-monitor components, critical components, and essential components that are subject to this rule and the reason(s) for such designation; except for pipes, the location of components subject to the rule (components may be grouped together functionally by process unit or facility description); except for pipes, components exempt pursuant to Section 4.8 (except for components buried below ground) may be described in the OMP by grouping them functionally by process unit or facility description (the results of any laboratory testing or other pertinent information to demonstrate compliance with the applicable exemption criteria for components for which an exemption is being claimed pursuant to Sections 4.8 shall be submitted with the OMP); a detailed schedule of an operator's inspections of components to be conducted as required by this rule and whether the operator inspections of components required by this rule will be performed by a qualified contractor or by an in-house team; a description of the training standards for personnel that inspect and repair components; and a description of the leak detection training for conducting the test method specified in Section 6.3.3 for new operators, and for experienced operators, as necessary. [District Rule 4401, 6.6] Federally Enforceable Through Title V Permit
59. Records of leaks detected during annual operator inspections, and each subsequent repair and re-inspection, shall be submitted to the District, ARB, and EPA upon request. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit
60. Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components. The records shall include a copy of the current calibration gas certification from the vendor of the calibration gas cylinder, the date of calibration, the concentration of calibration gas, the instrument reading of calibration gas before adjustment, the instrument reading of calibration gas after adjustment, the calibration gas expiration date, and the calibration gas cylinder pressure at the time of calibration. [District Rule 4401, 6.1.6] Federally Enforceable Through Title V Permit
61. All records required by this permit shall be maintained and retained for a minimum of five (5) years and made available for District, ARB, and EPA inspection upon request. [District Rule 4401, 6.1] 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-1129-386-22

EXPIRATION DATE: 02/28/2027

SECTION: 34 **TOWNSHIP:** 30S **RANGE:** 22E

EQUIPMENT DESCRIPTION:

THERMALLY ENHANCED OIL RECOVERY OPERATION WITH WELL VENT VAPOR COLLECTION PIPING NETWORK SERVING 120 STEAM ENHANCED WELLS AND WET LACT SEPARATOR VESSEL/PERMIT S-1128-1027 (NORTH MIDWAY)

PERMIT UNIT REQUIREMENTS

1. The crude oil production from wells associated with this permit unit shall not lie within 1000 feet of an air injection well used for in-situ combustion. [District Rule 4407, 2.0, 3.4, and 3.5] Federally Enforceable Through Title V Permit
2. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (as amended December 16, 1993). [District Rule 1081 and Kern County Rule 108.1] Federally Enforceable Through Title V Permit
3. Well casing vents or downstream valves may be closed if wells are producing to tanks equipped with 99% vapor control or if the wells are idle. [District Rules 2201 and 4401, 5.5] Federally Enforceable Through Title V Permit
4. Fugitive emissions from TEOR system including condensate collection and handling shall not exceed 118.6 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Fugitive VOC limit listed above does not include components at the well-head up to the point of initial gas/liquid separation, or existing production handling or flow measurement facilities, or shown to be handling produced fluids with an API gravity less than 30 degrees or fluid streams containing more than 50% water (by weight) or with a VOC content of 10% (by weight) or less. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Components to be screened and counted for determining compliance with fugitive VOC limit listed above shall be identified and categorized according to the appropriate fluid types (gas or water/oil) in Table 2-4 of the EPA's "1995 Protocol for Equipment Leak Emission Estimates" (EPA-453/R-95-017) and the following component types: valves, fittings, threaded connections, open-ended lines, pumps, compressors, pressure relief devices, pipes, flanges, process drains, sealing mechanisms, hatches, sight-glasses, meters, or seal fluid systems. [District Rule 2201] Federally Enforceable Through Title V Permit
7. TEOR operation with well vent vapor control system including: gas/liquid separators, water-cooled heat exchangers, fin-fan cooling towers, vacuum pumps with separators, liquid transfer pumps, casing gathering line, liquid traps and pumps, compressors, fin fan heat exchangers, 2-phase separators, and non-condensable gas line with liquid traps to existing incineration steam generator S-1128-1023 or DOGGR approved vapor disposal wells. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Operation shall include condensate piping to existing crude oil wash tank. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Gas/liquid separators and condensate drums/tanks and all other equipment used to handle or store condensate shall be enclosed and shall vent only to vapor control system. [District NSR Rule] 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. Water/VOC condensate from gas/liquid separators and condensate drums shall be pumped only to production manifold or to production facilities equipped with an operating vapor control system. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Condensate storage/production wash tank shall be operated at a constant fluid level. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Collected vapors shall be disposed of in District approved incineration devices as listed on this permit or in Department of Oil, Gas and Geothermal Resources (DOGGR) approved vapor disposal wells. Permittee shall make copies of DOGGR approval for injection wells and make such documentation readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Permittee shall document Department of Oil & Gas Geothermal Resources approval for vapor disposal wells prior to injection of vapors. [District Rules 4401 and NSR] Federally Enforceable Through Title V Permit
14. Permittee shall cease injection vapors & notify the District immediately if DOGGR injection approval is revoked, denied, terminated, surrendered or altered to disallow injection. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The VOC content of the casing gas shall not exceed 25% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Operator shall conduct quarterly sampling of the well casing gas. If the gas sampled is 25% or less VOC by weight for eight consecutive quarterly samplings, the sampling frequency shall only be required annually. If a test shows noncompliance with the percent VOC requirement, the source must return to quarterly testing until eight consecutive quarters show compliance. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The operator shall maintain a copy of the latest APCO-approved Operator Management Plan (OMP) at the facility and make it available to the APCO, ARB, and US EPA upon request. [District Rule 4401, 6.1.8] Federally Enforceable Through Title V Permit
18. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4401, 6.7] Federally Enforceable Through Title V Permit
19. In accordance with the approved OMP, the operator shall meet all applicable operating, inspection and re-inspection, maintenance, component identification, record keeping, and notification requirements of Rule 4401 for all steam enhanced crude oil production wells at this facility except for those wells and components specifically exempted in Section 4.0 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
20. The operator shall maintain an inspection log that has been signed and dated by the facility operator responsible for the inspection, certifying the accuracy of the information recorded in the log. The inspection log shall contain, at a minimum, all of the following information: 1) The total number of components inspected, and the total number and percentage of leaking components found by component types; 2) The location, type, name or description of each leaking component and the description of any unit where the leaking component is found; 3) Date of the leak detection and method of the leak detection; 4) For gaseous leaks, record the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak; 5) The date of repair, replacement, or removal from operation of the leaking component(s); 6) The identification and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes first; 7) The method(s) used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier; 8) The date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced; 9) The inspector's name, business mailing address, and business telephone number. [District Rule 4401, 6.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

21. Steam-enhanced crude oil production well vents shall be closed, except when 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, and the front line production equipment downstream of the wells that carry produced fluids be connected to a VOC collection and control system. Alternatively, steam-enhanced crude oil production well vents shall be open and the well vents connected to a VOC collection and control system. [District Rule 4401, 5.5.1] Federally Enforceable Through Title V Permit
22. The operator shall be in violation of Rule 4401 if any District inspection, or operator inspection conducted as a requirement of this rule, demonstrates that one or more of the leak standard conditions set forth in section 5.6.2 exists. [District Rule 4401, 5.6.1] Federally Enforceable Through Title V Permit
23. There shall not be an open-ended line or a valve located at the end of the line that is not sealed with a blind flange, plug, cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended lines. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401, 5.6.2.1] Federally Enforceable Through Title V Permit
24. For pressure relief devices (PRDs) a major gas leak is greater than 10,000 ppmv and a minor gas leak is from 400 to 10,000 ppmv. For components other than PRDs a major gas leak is greater than 10,000 ppmv and a minor gas leak is from 2,000 to 10,000 ppmv. A major liquid leak is a visible mist or a continuous flow of liquid that is not seal lubricant. A minor liquid leak is a liquid leak, except seal lubricant, that is not a major liquid leak and drips liquid at a rate of more than three drops per minute. Any liquid or gas coming from a component undergoing repair or replacement, or during sampling of process fluid from a component into a container is not considered a leak provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401, 3.20] Federally Enforceable Through Title V Permit
25. There shall be no components with major liquid leaks or with gas leaks greater than 50,000 ppmv. [District Rule 4401, 5.6.2.2 and 5.6.2.3] Federally Enforceable Through Title V Permit
26. There shall not be more minor liquid leaks, minor gas leaks, or gas leaks greater than 10,000 ppmv up to 50,000 ppmv than the following: 3 leaks for 1 - 25 wells, 6 leaks for 26 - 50 wells, 8 leaks for 51 - 100 wells, 10 leaks for 101 - 250 wells, 15 leaks for 251 - 500 wells, and 1 leak for each 20 wells (with a minimum of 50 wells test) for more than 500 wells connected to a VOC collection and control system. [District Rule 4401, 5.6.2.4] Federally Enforceable Through Title V Permit
27. Components that have been found leaking in excess of the applicable leak standards of this rule may be used provided such leaking components have been identified with a tag for repair, are repaired, or are awaiting re-inspection after being repaired, within the applicable time period specified in this permit. [District Rule 4401, 5.7.1] Federally Enforceable Through Title V Permit
28. 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 and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401, 5.7.2] Federally Enforceable Through Title V Permit
29. Except for pipes and unsafe-to-monitor components, all other components shall be inspected pursuant to the requirements of section 6.3.3 at least once every year. [District Rule 4401, 5.8.1] Federally Enforceable Through Title V Permit
30. All pipes shall be visually inspected at least once every year. Any visual inspection of pipes that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected within 24 hours after detecting the leak. If a leak is found, the leak shall be repaired as soon as practicable but not later than as allowed by Rule 4401 and specified in this permit. [District Rule 4401, 5.8.2] Federally Enforceable Through Title V Permit
31. The operator shall audio-visually (by hearing and by sight) inspect for leaks all accessible operating pumps, compressors, and PRDs in service at least once each calendar week. [District Rule 4401, 5.8.3.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

32. Any audio-visual inspection of an accessible operating pump, compressor, and PRD performed by an operator that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected not later than 24 hours after conducting the audio-visual inspection. If a leak is found, the leak shall be repaired as soon as practicable but not later than as allowed by Rule 4401 and specified in this permit. [District Rule 4401, 5.8.3.2] Federally Enforceable Through Title V Permit
33. The operator shall initially inspect a PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the discovery of the release. The operator shall re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection. [District Rule 4401, 5.8.4.1] Federally Enforceable Through Title V Permit
34. The operator shall inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. The operator shall inspect a component, other than PRDs, that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. The operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401, 5.8.4.2, 5.8.4.3, 5.8.5] Federally Enforceable Through Title V Permit
35. A District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. [District Rule 4401, 5.8.6] Federally Enforceable Through Title V Permit
36. The operator, upon detection of a leaking component, shall affix to that component a weatherproof, readily visible tag, bearing the date and time when the leak was detected and the date and time of the leak measurement. For gaseous leaks, the tag shall indicate the leak concentration in ppmv. For liquid leaks, the tag shall indicate whether it is a major liquid leak or a minor liquid leak. The tag shall indicate, when applicable, whether the component is an essential component, an unsafe-to-monitor component, or a critical component. The tag shall remain in place until the leaking component is repaired or replaced and reinspected and found to be in compliance with the requirements of this rule. [District Rule 4401 5.9.1, 5.9.2] Federally Enforceable Through Title V Permit
37. The operator shall minimize all component leaks immediately, to the extent possible, but not later than one hour after detection of the leak in order to stop or reduce leakage to the atmosphere. Except for leaking critical components or leaking essential components, if the leak has been minimized but the leak still exceeds the applicable leak standards specified in this permit, the operator shall do one of the following within the timeframes specified within this permit: 1) repair or replace the leaking component; 2) vent the leaking component to a closed vent system; 3) or remove the leaking component from operation. A closed vent system is a District approved system that is not open to the atmosphere. It is composed of hard-piping, ductwork connections and, if necessary, flow inducing devices that transport gas or vapor from a piece or pieces of equipment to a District approved control device that has a overall VOC collection and destruction or removal efficiency of at least 99%, or that transports gases or vapors back to a process system. [District Rule 4401, 5.9.3, 5.9.4] Federally Enforceable Through Title V Permit
38. The operator shall repair minor gas leaks within 14 days, major gas leaks which less than or equal to 50,000 ppmv within 5 days., major gas leaks which are greater than 50,000 ppmv within two days, minor liquid leaks within 3 days, and major liquid leaks within 2 days. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period. The start of the repair period shall be the time of the initial leak detection. [District Rule 4401, 5.9.4, 5.9.5, and 5.9.6] Federally Enforceable Through Title V Permit
39. If a leaking component is an essential component or a critical component which cannot be shut down immediately for repairs, and after being minimized still exceeds the applicable leak standard, the operator shall repair or replace the component to eliminate the leak during the next process unit turnaround or no later than one year from the date of original leak detection, which ever is earlier. [District Rule 4401, 5.9.7] Federally Enforceable Through Title V Permit
40. The operator of any steam-enhanced crude oil production well shall maintain records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401, 6.1.1] Federally Enforceable Through Title V Permit
41. An operator of any steam-enhanced crude oil production well shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system. [District Rule 4401, 6.1.3] 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.

42. The operator shall maintain copies of training records and of the latest APCO-approved Operator Management Plan (OMP) at the facility and make such available to the APCO, ARB, and US EPA upon request. [District Rule 4401, 6.1.7, 6.1.8] Federally Enforceable Through Title V Permit
43. The results of periodic gauge tank TVP testing conducted shall be submitted to the APCO within 60 days after the completion of the testing. [District Rule 4401, 6.1.10] Federally Enforceable Through Title V Permit
44. 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. The operator shall submit such information recorded during the calendar year to the APCO no later than 60 days after the end of the calendar year. [District Rule 4401, 6.1.11] Federally Enforceable Through Title V Permit
45. Except as elsewhere in this permit, the operator shall source test annually all vapor collection and control systems used to control emissions from steam-enhanced crude oil production well vents to determine the control efficiency of the device(s) used for destruction or removal of VOC. Compliance testing shall be performed annually by source testers certified by ARB. Testing shall be performed during June, July, August, or September of each year if the system's control efficiency is dependent upon ambient air temperature. [District Rule 4401, 6.2.1] Federally Enforceable Through Title V Permit
46. If approved by EPA, ARB, and the APCO, an operator need not comply with the annual control efficiency testing requirement if all uncondensed VOC emissions collected by the vapor collection and control system are incinerated in fuel burning equipment, an internal combustion engine or in a smokeless flare, or if the vapor collection and control does not have a VOC destruction device. [District Rule 4401, 6.2.2, 6.2.3] Federally Enforceable Through Title V Permit
47. An operator seeking approval a waiver of the annual control efficiency testing requirement shall submit a written request and supporting information to the APCO. The District shall evaluate the request and if approved by the APCO, the District shall provide EPA and ARB with a copy of the evaluation and shall request EPA and ARB approval. The District evaluation and the APCO request shall be deemed approved unless EPA or ARB objects to such approval in writing within 45 days of the receipt of the APCO request. [District Rule 4401, 6.2.4] Federally Enforceable Through Title V Permit
48. The operator shall conduct TVP testing of each gauge tank, as defined by Section 3.17 of Rule 4401, at least once every 24 months during summer (July - September), and whenever there is a change in the source or type of produced fluid in the gauge tank. The TVP testing shall be conducted at the actual storage temperature of the produced fluid in the gauge tank using the applicable TVP test method specified in Rule 4623 (Storage of Organic Liquids). [District Rule 4401, 6.2.5] Federally Enforceable Through Title V Permit
49. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4401, 6.3.1] Federally Enforceable Through Title V Permit
50. VOC content shall be analyzed by using the latest revision of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be performed by using ARB Method 432. [District Rule 4401, 6.3.2] Federally Enforceable Through Title V Permit
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, 6.3.3] 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, 6.3.5] Federally Enforceable Through Title V Permit
53. The operator shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures, as necessary. [District Rule 4401, 6.5] Federally Enforceable Through Title V Permit
54. The operator shall maintain an APCO approved Operator Management Plan (OMP). The OMP shall include, at a minimum, a description of all wells and all associated VOC collection and control systems subject to this rule, and all wells and all associated VOC collection and control systems that are exempt; an identification and description of any known hazard that might affect the safety of an inspector; except for pipes, the number of components that are subject to this rule by component type; except for pipes, the number and types of major components, inaccessible components, unsafe-to-monitor components, critical components, and essential components that are subject to this rule and the reason(s) for such designation; except for pipes, the location of components subject to the rule (components may be grouped together functionally by process unit or facility description); except for pipes, components exempt pursuant to Section 4.8 (except for components buried below ground) may be described in the OMP by grouping them functionally by process unit or facility description (the results of any laboratory testing or other pertinent information to demonstrate compliance with the applicable exemption criteria for components for which an exemption is being claimed pursuant to Sections 4.8 shall be submitted with the OMP); a detailed schedule of an operator's inspections of components to be conducted as required by this rule and whether the operator inspections of components required by this rule will be performed by a qualified contractor or by an in-house team; a description of the training standards for personnel that inspect and repair components; and a description of the leak detection training for conducting the test method specified in Section 6.3.3 for new operators, and for experienced operators, as necessary. [District Rule 4401, 6.6] Federally Enforceable Through Title V Permit
55. Permittee shall maintain records of number and type of fugitive emissions components and calculated fugitive emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
56. Records of leaks detected during annual operator inspections, and each subsequent repair and re-inspection, shall be submitted to the District, ARB, and EPA upon request. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit
57. Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components. The records shall include a copy of the current calibration gas certification from the vendor of the calibration gas cylinder, the date of calibration, the concentration of calibration gas, the instrument reading of calibration gas before adjustment, the instrument reading of calibration gas after adjustment, the calibration gas expiration date, and the calibration gas cylinder pressure at the time of calibration. [District Rule 4401, 6.1.6] Federally Enforceable Through Title V Permit
58. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit

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

ATTACHMENT B

Previous Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: S-1129-0-4

EXPIRATION DATE: 02/28/2022

FACILITY-WIDE REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: CHEVRON USA INC
Location: HEAVY OIL WESTERN, CA
S-1129-0-4 : Dec 14 2022 10:42AM - MURPHYA

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. In use includes, but is not limited to: being accessed, filled, emptied, maintained or repaired. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8021] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8041] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8051] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8061] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8071] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

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

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. All permits for facilities S-1128, S-1129, S-1141, S-1549, and S-2592 are included in the Chevron USA, Inc. Heavy Oil Western stationary source. [District Rule 2201] Federally Enforceable Through Title V Permit
43. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
44. For vapor recovery systems connected to tanks with pressure relief valves, operator shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
45. For tanks equipped with pressure relief valves, operator shall inspect pressure relief valves for fugitive leaks annually in accordance with EPA Method 21, with the instrument calibrated with methane. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
46. On June 30, 2002, the initial Title V permit was issued, the reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin July 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 45 days of the end of reporting period. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

ATTACHMENT C

Detailed Summary List of Facility Permits

Detailed Facility Report
For Facility=1129 and excluding Deleted Permits
Sorted by Facility Name and Permit Number

CHEVRON USA INC	FAC #	S 1129	TYPE:	TitleV	EXPIRE ON:	02/28/2022
HEAVY OIL WESTERN	STATUS:	A	TOXIC ID:	50307	AREA:	5 / 21
CA	TELEPHONE:				INSP. DATE:	07/23

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
S-1129-385-16	40 wells	3020-09 A	40	11.23	449.20	A	THERMALLY ENHANCED OIL RECOVERY OPERATION WITH WELL VENT VAPOR COLLECTION PIPING NETWORK AND FLARE SERVING 40 OIL PRODUCTION WELLS (MCKITTRICK OILFIELD)
S-1129-386-21	120 wells	3020-09 A	120	11.23	1,347.60	A	THERMALLY ENHANCED OIL RECOVERY OPERATION WITH WELL VENT VAPOR COLLECTION PIPING NETWORK SERVING 119 STEAM DRIVE WELLS, 1 CYCLIC WELL AND WET LACT SEPARATOR VESSEL/PERMIT S-1129-867 (NORTH MIDWAY)
S-1129-864-13	200 TEOR wells	3020-09 B	200	11.23	1,681.00	A	THERMALLY ENHANCED OIL RECOVERY OPERATION WITH A MAXIMUM OF 200 CLOSED CASING VENT STEAM-ENHANCED WELLS AND PRODUCTION FACILITIES INCLUDING AUTOMATIC WELL TEST VESSEL(S), MASTER TRAP VESSEL, COMPRESSOR(S), COOLERS AND CHILLER(S) WITH VAPOR PIPING FROM '-865 AND '-866; AND TO TEOR PERMIT S-1128-116

Number of Facilities Reported: 1

ATTACHMENT D

Facility Comments and District Responses

FACILITY COMMENTS / DISTRICT RESPONSES

Facility comments regarding the preliminary decision on the Title V permit renewal for Chevron USA, Inc. (District facility S-1129) are provided below followed by the District's responses. A copy of the facility's March 1, 2023 comment email is available at the District office.

Permit Unit S-1129-0-5: Facility-Wide Permit

Facility Comment: *Removal of facility ID from stationary source*

The facility requests that the reference to facility S-1549 be removed from condition #42 on facility-wide permit S-1129-0-5. All permits for facility S-1549 have previously been canceled.

District Response:

The District has verified that facility S-1549 does not currently have any valid operating permits. Additionally, facility S-1549 was deleted from the District's permit database in 2008 and is no longer an active facility ID. Therefore, condition #42 on facility-wide permit S-1129-0-5 has been revised and now reads as follows:

- All permits for facilities S-1128, S-1129, S-1141, and S-2592 are included in the Chevron USA, Inc. Heavy Oil Western stationary source. [District Rule 2201]

Permit Unit S-1129-385-17: Thermally Enhanced Oil Recovery Operation

Facility Comment: *Equipment Description Change*

The facility requests that the equipment description for permit S-1129-385-17, which authorizes a thermally enhanced oil recovery operation served by a vapor collection system and a flare, be changed from "40 oil production wells" to "40 Steam-Enhanced wells."

District Response:

The facility had previously requested, and was granted approval for, this equipment description change under Authority to Construct S-1129-385-13 (project S-1084922). In that ATC application, the facility has stated that "steam-enhanced" more accurately describes wells stimulated by and responding to steam injection, and that the request to change "oil production wells" to "steam-enhanced wells" is a matter of terminology standardization.

However, when the District processed the Title V minor modification project (project S-1095362) to incorporate this ATC in to Chevron USA, Inc.'s Title V permit, the equipment description change to "steam enhanced wells" was inadvertently left out of the equipment description of the final modified Title V permit and the previous permit equipment description language of "oil production wells" remained on the permit.

Since this proposed change to the equipment description had already been authorized by the District under ATC project S-1084922 and the language was inadvertently not included on the modified Title V permit at that time, the equipment description for permit S-1129-385-17 will be revised and reads as follows:

- THERMALLY ENHANCED OIL RECOVERY OPERATION WITH WELL VENT VAPOR COLLECTION PIPING NETWORK AND FLARE SERVING 40 STEAM ENHANCED WELLS (MCKITTRICK OILFIELD)

Permit Unit S-1129-386-22: Thermally Enhanced Oil Recovery Operation

Facility Comment: *Equipment Description Change*

The facility requests that the equipment description for permit S-1129-386-22, which authorizes a thermally enhanced oil recovery operation and Wet LACT separator vessel served by a vapor collection system, be changed from "119 Steam Drive wells, 1 Cyclic well" to "120 Steam-Enhanced wells".

Additionally, the facility requests that the reference to the Wet LACT separator vessel be removed from the equipment description, as the permit was transferred to S-1127-1027 and the equipment was subsequently sold to Berry Petroleum.

District Response:

The facility had previously requested, and was granted approval for, this equipment description change under Authority to Construct S-1129-386-19 (project S-1084922). In that ATC application, the facility has stated that "steam-enhanced" more accurately describes wells stimulated by and responding to steam injection, and that the request to change "oil production wells" to "steam-enhanced wells" is a matter of terminology standardization. Additionally, the facility has stated that the distinction between steam drive and cyclic wells no longer serves as a basis for emissions per the EPA's "Protocol for Equipment Leak Emission Estimates" or "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities, Table IV-2c — Oil and Gas Production Screening Value Ranges Emission Factors."

However, when the District processed the Title V minor modification project (project S-1095362) to incorporate this ATC in to Chevron USA, Inc.'s Title V permit, the equipment description change to "steam enhanced wells" was inadvertently left off of the equipment description of the final modified Title V permit and the previous permit equipment description language of "oil production wells" remained on the permit.

Additionally, the referenced wet LACT separator vessel under permit unit S-1129-867 was transferred to facility S-1128 under permit unit S-1128-1027 on January 29, 2019. Per District project S-1224294, the facility has requested to cancel this permit unit, as the permit has been removed from service and the site has been transferred to another oil company. However, the District has not completed the processing of this permit cancellation project as the new owner of the equipment has requested to have the ownership of the permit transferred rather than having the permit be cancelled.

As this transfer of ownership project is still being processed by the District, the applicant will need to submit a Title V Administration Amendment application to remove the reference to the wet LACT separator vessel in the equipment description once project S-1224294 has been finalized and permit unit S-1128-1027 has been canceled. The equipment description will be revised to reference the correct current permit unit for this wet LACT separator vessel, S-1128-1027

The revised equipment description for permit S-1129-386-22 will be revised and reads as follows:

- THERMALLY ENHANCED OIL RECOVERY OPERATION WITH WELL VENT VAPOR COLLECTION PIPING NETWORK SERVING 120 STEAM ENHANCED WELLS AND WET LACT SEPARATOR VESSEL/PERMIT S-1128-1027 (NORTH MIDWAY)

Permit Unit S-1129-386-22: Thermally Enhanced Oil Recovery Operation

Facility Comment: *Permit Condition Change*

The facility requests that the reference to permit unit S-1129-24 be changed to S-1128-1023 in condition #7 of permit S-129-386-22, as this unit was transferred and is now operating under permit S-1128-1023.

District Response:

On January 29, 2019, permit unit S-1129-24 was transferred to facility S-1128 under new permit unit S-1128-1023 (reference project S-1190120). Therefore, condition #7 on permit S-1129-386-22 has been revised and reads as follows:

- TEOR operation with well vent vapor control system including: gas/liquid separators, water-cooled heat exchangers, fin-fan cooling towers, vacuum pumps with separators, liquid transfer pumps, casing gathering line, liquid traps and pumps, compressors, fin fan heat exchangers, 2-phase separators, and non-condensable gas line with liquid traps to existing incineration steam generator S-1128-1023 or DOGGR approved vapor disposal wells. [District NSR Rule]