



November 3, 2022

Mr. Gary Grillette TRC Cyprus Group LLC 805 Black Gold Ct Taft, CA 93268

Re: Notice of Preliminary Decision - Title V Permit Renewal

Facility Number: S-3088 Project Number: S-1212032

Dear Mr. Grillette:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for TRC Cyprus Group LLC, located at the Heavy Oil Western Stationary Source in Kern County, California.

The notice of preliminary decision for this project has been posted on the District's website (www.valleyair.org). After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the renewed Federally Mandated Operating Permit. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

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

Gerardo Rios, EPA (w/enclosure) via EPS CC:

> Samir Sheikh Executive Director/Air Pollution Control Officer

SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

Proposed Title V Permit Renewal Evaluation TRC Cypress Group LLC S-3088

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TITLE V PERMIT RENEWAL EVALUATION

Crude Oil and Natural Gas Production Facility

Engineer: Mohamed Muthana

Date: November 2, 2022

Facility Number: S-3088

Facility Name: TRC Cyprus Group LLC Mailing Address: 805 Black Gold Ct

Taft, CA 93268

Contact Name: Gary Grillette

Phone: (661) 763-0081

Responsible Official: Gary Grillette

Title: Operations Engineer

Project #: S-1212032

Deemed Complete: June 3, 2021

I. PROPOSAL

TRC Cyprus Group LLC was issued their last renewed Title V permit on December 11, 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

TRC Cyprus Group LLC 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 2201, New and Modified Stationary Source Review Rule (amended February 18, 2016 – SIP version ⇒ amended August 15, 2019 – non-SIP version)
- District Rule 2520, <u>Federally Mandated Operating Permits</u> (amended June 21, 2001 ⇒ amended August 15, 2019)
- District Rule 4306, <u>Boilers, Steam Generators, and Process Heaters Phase 3</u> (amended October 16, 2008 SIP version ⇒ amended December 17, 2020 non-SIP version)
- District Rule 4311, Flares (amended June 18, 2009 SIP version ⇒ amended December 17, 2020 non-SIP version)
- District Rule 4320, <u>Advanced Emission Reduction Options for Boilers</u>, <u>Steam Generators</u>, and <u>Process Heaters Greater Than 5.0 MMBTU/HR</u> (adopted October 16, 2008 – SIP version ⇒ amended December 17, 2020 – non-SIP version)
- District Rule 4601, <u>Architectural Coatings</u> (amended December 17, 2009 SIP version ⇒ amended April 16, 2020 – non-SIP version)¹

¹ District Rule 4601 was amended on April 16, 2020, however the amended rule is not SIP-Approved by EPA; therefore conditions 26-28 for existing permit S-3088-0-3 are still valid.

- 40 CFR Part 60 Subpart OOOO, <u>Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After August 23, 2011, and on or Before September 18, 2015</u> (August 16, 2012 ⇒ amended September 14, 2020)
- 40 CFR Part 60 Subpart OOOOa, <u>Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After September 18, 2015 (June 3, 2016 ⇒ amended September 15, 2020)</u>
- 40 CFR Part 64, <u>Compliance Assurance Monitoring (CAM)</u> (October 22, 1997)
- 40 CFR Part 82, Subpart B, <u>Servicing of Motor Vehicle Air Conditioners</u> (amended June 18, 2008 ⇒ amended July 25, 2013)²
- 40 CFR Part 82, Subpart F, <u>Recycling and Emission Reduction</u> (amended June 18, 2008 ⇒ amended November 18, 2016 and December 27, 2017)²

B. Rules Added

No rules have been added since the last permit renewal.

C. Rules Removed

 Fresno County Rule 110, <u>Equipment Breakdown</u> (SIP approved August 8, 1977 ⇒ District resolution to rescind from SIP February 17, 2022)

- Kern County Rule 111, <u>Equipment Breakdown</u> (SIP approved October 24, 1980 ⇒ District resolution to rescind from SIP February 17, 2022)
- Kings County Rule 111, <u>Equipment Breakdown</u> (SIP approved June 18, 1982 ⇒ District resolution to rescind from SIP 2/17/2022)
- Madera County Rule 113, <u>Equipment Breakdown</u> (SIP approved November 18, 1983 ⇒ District resolution to rescind from SIP February 17, 2022)
- Merced County Rule 109, <u>Equipment Breakdown</u> (SIP approved June 18, 1982 ⇒ District resolution to rescind from SIP February 17, 2022)

² These subparts were amended since last renewal TV permit was issued. However, the amendments to these subparts do not have any effect on existing permit requirements as addressed by conditions 30 and 31 of permit unit S3088-0-4 on the draft renewed permit.

- San Joaquin County Rule 110, <u>Equipment Breakdown</u> (SIP approved December 5, 1984 ⇒ District resolution to rescind from SIP February 17, 2022)
- Stanislaus County Rule 110, <u>Equipment Breakdown</u> (SIP approved 6/1/1983 ⇒ District resolution to rescind from SIP February 17, 2022)
- Tulare County Rule 111, <u>Equipment Breakdown</u> (SIP approved August 22, 1997⇒ District resolution to rescind from SIP February 17, 2022)

D. Rules Not Updated

- District Rule 1070, Inspections amended December 17, 1992)
- District Rule 1080, <u>Stack Monitoring</u> (amended December 17, 1992)
- District Rule 1081, Source Sampling (amended December 16, 1993)
- District Rule 1160 <u>Emission Statements</u> (amended December 17, 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, <u>Transfer of Permits</u> (amended December 17, 1992)
- District Rule 2040, Applications (amended December 17, 1992)
- District Rule 2070, <u>Standards for Granting Applications</u> (amended December 17, 1992)
- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 2410, <u>Prevention of Significant Deterioration</u> (adopted June 16, 2011)
- District Rule 4101, <u>Visible Emissions</u> (amended February 17, 2005)
- District Rule 4201, <u>Particulate Matter Concentration</u> (amended December 17, 1992)
- District Rule 4301, <u>Fuel Burning Equipment</u> (amended December 17, 1992)

- District Rule 4305, <u>Boilers, Steam Generators and Process Heaters Phase 2</u> (amended August 21, 2003)
- District Rule 4401, <u>Steam-Enhanced Crude Oil Production Wells</u> (amended June 16, 2011)
- District Rule 4405, Oxides of Nitrogen Emissions from Existing Steam Generators Used In Thermally Enhanced Oil Recovery - Central and Western Kern County Fields (amended December 17, 1992)
- District Rule 4623, Storage of Organic Liquids (Amended May 19, 2005)
- District Rule 4801, Sulfur Compounds (amended December 17, 1992)
- District Rule 8011, <u>Fugitive Dust General Requirements</u> (amended August 19, 2004)
- District Rule 8021, <u>Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Construction</u>, <u>Demolition</u>, <u>Excavation</u>, <u>and Extraction Activities</u> (amended August 19, 2004)
- District Rule 8031, <u>Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Handling and Storage of Bulk Materials</u> (Amended August 19, 2004)
- District Rule 8041, <u>Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Carryout and Trackout</u> (amended August 19, 2004)
- District Rule 8051, <u>Fugitive Dust Requirements for Control of Fine</u> <u>Particulate Matter (PM10) from Open Area</u> (amended August 19, 2004)
- District Rule 8061, <u>Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Paved and Unpaved Roads</u> (amended August 19, 2004)
- District Rule 8071, <u>Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Unpaved Vehicle/Equipment Areas</u> (amended September 16, 2004)
- 40 CFR Part 61, Subpart M, <u>National Emission Standard for Asbestos</u> (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 Updated/Removed

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

C. Rules Added

No rules were added since the last Title V permit renewal.

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. 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.

Since the above mentioned equipment breakdown rules are no longer in the SIP, all reference to these removed rules will be removed from conditions 4 and 5 on draft facility-wide permit S-3088-0-4. Conditions 4 and 5 on permit S-3088-0-4 will not be Federally Enforceable.

Additionally with the removal of the county equipment breakdown rules from the SIP, condition 42 from facility-wide permit S-3088-0-3 will be removed since all the rules referenced in the condition are no longer in the SIP. The condition removed is provided below.

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]

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

District Rule 2201 has been amended since this facility's last renewal 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.

B. 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.

C. District Rule 4306 - <u>Boilers, Steam Generators, and Process Heater - Phase 3</u>

This rule was amended on December 17, 2020, but the rule amendments have not been incorporated into the SIP. The amended rule is as stringent as the SIP approved version of the rule that was adopted on October 16, 2008.

The rule requires the facility to submit an Authority to Construct permit application and have each unit at their facility be in full compliance with the amended requirements of this rule by December 31, 2023. The applicant has submitted the appropriate ATC application for the three steam generators operated at this facility to bring them into compliance with the requirements of the recent amendments by the compliance deadline (reference project S-1221387).

D. District Rule 4311, Flares

District Rule 4311 was amended on December 17, 2020, but the rule amendments have not been incorporated into the SIP. The amended rule is as stringent as the SIP approved version of the rule that was adopted June 15, 2006.

The rule requires the facility to submit an Authority to Construct permit application and have each unit at their facility be in full compliance with the amended requirements of this rule by December 31, 2023. The applicant has submitted an ATC application for the modification of permit unit S-3088-8, to ensure the standby flare is in compliance with the recent rule amendments by the compliance deadline (reference project S-1223137).

E. District Rule 4320 - <u>Advanced Emission Reduction Options for Boilers</u>, Steam Generators, and Process Heaters Greater Than 5.0 MMBTU/HR

District Rule 4320 was amended on December 17, 2020, but the rule amendments have not been incorporated into the SIP. The amended rule is as stringent as the SIP approved version of the rule that was adopted on October 16, 2008.

The rule requires the facility to submit an Authority to Construct permit application and have each unit at their facility be in full compliance with the amended requirements of this rule by December 31, 2023. The applicant has submitted the appropriate ATC application for the three steam generators operated at this facility to bring them into compliance with the requirements of

the recent amendments by the compliance deadline (reference project S-1221387).

F. 40 CFR Part 60 Subpart OOOO - <u>Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After August 23, 2011, and on or Before September 18, 2015</u>

Equipment installed, modified, or reconstructed after August 13, 2011 and before September 18, 2015 at on shore crude oil and natural gas production facilities are subject to requirements of this subpart.

In particular, the standards apply to natural gas well completions, oil/condensate storage tanks with individual tank VOC emissions of 6 tons per day or greater, certain centrifugal compressors with wet seals and reciprocating compressors, continuous bleed natural gas-driven pneumatic controllers with a bleed rate greater than 6 scfh, glycol dehydrators at major HAP sources, leak detection limits for new valves at gas processing plants, and sulfur removal units producing sulfur at a rate of at least 5 tons/day and located at natural gas processing plants.

The standards could potentially apply to the storage tanks located at this facility. However, Subpart OOOO has no standards for tanks with annual VOC emissions less than 6 tons per year. None of the tanks in this facility meet the threshold for applicability of the rule. Therefore, the tanks are not an affected facility and Subpart OOOO does not apply.

G. 40 CFR Part 60 Subpart OOOOa - <u>Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After September 18, 2015</u>

Equipment installed, modified, or reconstructed after September 18, 2015 at on shore crude oil and natural gas production facilities are subject to requirements of this subpart.

The requirements of this rule apply to single wells that conduct well completion operations following hydraulic fracturing or refracturing, certain centrifugal compressors with wet seals, reciprocating compressors, continuous bleed natural gas-driven pneumatic controllers with a bleed rate greater than 6 scfh, equipment associated with a compressor station, dehydration units, sweetening units, storage vessels with a potential for VOC emissions greater than or equal to 6 tons per year, field gas gathering systems, liquefied natural gas units, pneumatic pump affected facilities, and specific fugitive emission components at well sites.

The only components potentially subject to this subpart are the storage tanks that commenced construction after September 18, 2015. However, none of the

storage tanks at this facility that were constructed between September 18, 2015 and November 16, 2020 have a potential to emit of 6 tons or more per year. Therefore, Subpart OOOOa does not apply.

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

§64.2 – Applicability

This section requires Compliance Assurance Monitoring (CAM) 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)
VOC	20,000
NOx	20,000
CO	200,000
PM ₁₀	140,000
SO _X	140,000

62.5 MMBtu/hr Steam Generators with Flue Gas Recirculation (Permits S-3088-7, '-20, and '-24)

The permits for these steam generators contain emission limits for NO_X , CO, VOC, PM_{10} and SO_X emissions. However, these steam generators are not equipped with any add on control devices for CO, VOC, PM_{10} or SO_X emissions. Therefore, the CAM requirements of 40 CFR 64 are not applicable for these pollutants and no further discussion is required.

The three steam generators at the facility are equipped with Flue Gas Recirculation (FGR) systems as add on controls. Each FGR system is used to reduce NOx emissions.

CAM would be required for steam generators with FGR if the pre-FGR emissions are greater than the CAM threshold. To assess whether CAM is triggered, an emission factor must be used that corresponds to the use of a low-NOx burner prior to the addition of control provided by the FGR.

The emission factor for these steam generators is derived from emission factors for combustion controlled by the low NOx burner and for combustion controlled by the low NOx burner plus FGR as listed in AP-42 Table 1.4-1. These emission factors from AP-42 table 1.4-1 for small boilers <100 MMBtu/hr are shown below:

	Emission Factor (lb/MMscf)
Uncontrolled	100
Controlled – Low NOx burners	50
Controlled – Low NOx burners/FGR	32

Using these emission factors, the control efficiency of added FGR and corresponding emission factors are calculated as:

FGR control efficiency: $100 \times (50-32)/50 = 36\%$

These steam generators are currently capable of operating in compliance with their permitted NOx emission limit of 0.017 lb/MMBtu. Therefore, the pre-FGR emission factor is calculated as follows:

Pre-FGR emission factor: 0.017 lb/MMBtu / (1-0.36) = 0.027 lb/MMBtu

Accordingly, the "uncontrolled" emissions for each of the steam generators are:

 $0.027 \text{ lb/MMBtu } \times 62.5 \text{ MMBtu/hr } \times 8760 \text{ hr/yr} = 14,783 \text{ lb/yr}$

Each of the steam generators "uncontrolled" NOx emissions is below the CAM applicability threshold of 20,000 lb-NOx , therefore CAM does not apply .

Thermally Enhanced Oil Recovery (TEOR) (S-3088-8) and Fixed Roof Crude Oil Tanks vented to a Vapor Collection System (S-3088-9, -10, -11, -12, -13, -14, -15, -16, and -21)

Vapor Collection System

The permit requirements for these units contain emissions limits. These units are all mated to the same vapor recovery system. For oilfield tanks and wells, CAM is required if an emission unit is subject to emission limit or standard to the pollutant of concern, uses a control device to comply with the emission limit or standard, and has a potential pre-control emissions greater than 10 ton/year.

Control device means equipment, other than inherent process equipment, that is used to destroy or remove air pollutant(s) prior to discharge to the atmosphere.

It is important to note that this definition includes an exemption for "inherent process equipment. Inherent process equipment is by definition not a control device. Emission units equipped with inherent process equipment are not subject to the requirements of CAM.

40 CFR Part 64 defines inherent process equipment as equipment that is necessary for the proper or safe functioning of the process, or material recovery equipment that the owner or operator documents is installed and operated primarily for purposes other than compliance with air pollution regulations.

Please note that the above definition requires that inherent process equipment must be used "... for the proper or safe operation of the process ..." It is important to note that the equipment need not be used solely for the proper or safe operation of the process. Such systems could be used for compliance with regulations as well.

The District has concluded that vapor control systems installed on oilfield tanks and oil production wells are inherent process equipment (and by definition are not a control device) for the reasons stated below:

- Tank and well vapor control systems reduce emission of H2S (a toxic substance) from the tanks/wells and as such assure worker safety for OSHA and other regulatory requirements.
- 2. Tank vapor control systems minimize air intrusion into the vapor space and as such reduces corrosion of the tank interior. Such systems are commonly installed even when they are not required to comply with District regulations.
- 3. Vapors collected by the tank and well vapor control system are burned in the steam generators at the facility in which useful energy is recovered. Steam generators, are used in oil production to enhance oil recovery from production wells. The steam generators, wells, and tanks (with the associated vapor control system) are part of the overall process to thermally enhance oil production. This system distributes the vapors to multiple steam generators (or other devices) for use as a fuel. The quantity of vapors from such vapor control systems combusted in a particular steam generator varies as the operational needs of the facility change.

For all of the reasons stated above, tank and well vapor control systems are truly inherent to the oil production process. As such we believe that these systems meet the criteria for "inherent process systems", and as such are not a control device for the purposes of CAM applicability.

Sulfur Scrubber

This vapor collection system is equipped with a sulfur scrubber that reduces the sulfur content of the fuel vapors collected by the vapor collection system serving this operation. The sulfur scrubber serves as a passive control measure to ensure the collected fuel vapor, which will eventually be used for fuel at the facility, has a low sulfur content. The scrubber itself does not destroy or remove any pollutant prior to discharge into the atmosphere, therefore the fuel scrubber is not a control device and is not subject to CAM.

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 are no obsolete permit shields from the existing permit requirements.

D. 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. 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 - Draft Renewed Title V Operating Permits

ATTACHMENTS

- A. Draft Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Detailed Summary List of Facility Permits

ATTACHMENT A

Draft Renewed Title V Operating Permit

EXPIRATION DA FACILITY: S-3088-0-4

FACILITY-WIDE REQUIREMENTS

- 1. Facilities S-3088 and S-2622 are included in the same stationary source. [District Rule 2201] Federally Enforceable Through Title V Permit
- To maintain status as a small producer, permittee's crude oil production shall average less than 6000 bbl/day from all operations within Kern County and permittee shall not engage in refining, transporting, or marketing of refined petroleum products. [District Rule 2080] Federally Enforceable Through Title V Permit
- No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 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]
- 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)]
- 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] Federally Enforceable Through Title V Permit
- 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, and 2020] Federally Enforceable Through Title V Permit
- 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, 2080; and 2520] Federally Enforceable Through Title V Permit
- 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
- 10. 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]
- 11. 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] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: TRC CYPRESS GROUP LLC

Location: HEAVY OIL WESTERN STATIONARY SOURCE,C S-3088-0-4: Oct 25 2022 9:36AM -- MUTHANAM

- 12. 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] Federally Enforceable Through Title V Permit
- 13. 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] Federally Enforceable Through Title V Permit
- 14. 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, 1100] Federally Enforceable Through Title V Permit
- 15. 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] Federally Enforceable Through Title V Permit
- 16. 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] Federally Enforceable Through Title V Permit
- 17. 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] Federally Enforceable Through Title V Permit
- 18. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520] Federally Enforceable Through Title V Permit
- 19. 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] Federally Enforceable Through Title V Permit
- 20. 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] Federally Enforceable Through Title V Permit
- 21. 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] Federally Enforceable Through Title V Permit
- 22. 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] Federally Enforceable Through Title V Permit
- 23. 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] Federally Enforceable Through Title V Permit
- 24. 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] 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.

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- 25. 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] Federally Enforceable Through Title V Permit
- 26. 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] Federally Enforceable Through Title V Permit
- 27. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601] Federally Enforceable Through Title V Permit
- 28. 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] Federally Enforceable Through Title V Permit
- 29. 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] Federally Enforceable Through Title V Permit
- 30. 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
- 31. 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
- 32. 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 Rule 8021 and 8011] Federally Enforceable Through Title V Permit
- 33. 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 Rule 8031 and 8011] Federally Enforceable Through Title V Permit
- 34. 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 Rule 8041 and 8011] Federally Enforceable Through Title V Permit
- 35. 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 Rule 8051 and 8011] Federally Enforceable Through Title V Permit
- 36. 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 Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
- 37. 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 Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit

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Facility Name: TRC CYPRESS GROUP LLC

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- 38. 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
- 39. 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] Federally Enforceable Through Title V Permit
- 40. 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] Federally Enforceable Through Title V Permit
- 41. 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] Federally Enforceable Through Title V Permit
- 42. 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] Federally Enforceable Through Title V Permit
- 43. On September 30, 2012, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin October 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

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Facility Name: TRC CYPRESS GROUP LLC HEAVY OIL WESTERN STATIONARY SOURCE

Location: S-3088-0-4 : Oct 25 2022 9:36AM -- MUTHANAM

PERMIT UNIT: S-3088-7-11

SECTION: SW22 **TOWNSHIP:** 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS/WASTE GAS FIRED STEAM GENERATOR WITH NORTH AMERICAN MAGNA-FLAME G-LE ULTRA LOW NOX BURNER AND FLUE GAS RECIRCULATION (CYPRESS LEASE)

PERMIT UNIT REQUIREMENTS

- All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- Emissions rates from the unit shall not exceed any of the following limits: 14 ppmv NOx @ 3% O2 or 0.017 lb-NOx/MMBtu, 0.037 lb-PM10/MMBtu, 104 ppmv CO @ 3% O2 or 0.0757 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
- Combined SOx emissions from steam generators S-3088-7, '-20, and '-24 shall not exceed 328.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- Fuel gas sulfur content shall not exceed 1 gr S/100 scf unless SOx is reduced by 95% or to 9 ppmv SOx @ 3% O2 in exhaust with scrubber. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
- Source testing to measure NOx and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 43061 Federally Enforceable Through Title V Permit
- Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 10. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 11. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V. Permit

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

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- 12. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 13. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 14. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
- 15. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 16. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 17. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 18. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 19. Permittee shall determine sulfur content of combusted gas weekly for eight consecutive weeks. After demonstrating compliance for eight consecutive weeks testing may be conducted on a quarterly basis. Weekly sulfur testing shall resume if quarterly testing does not indicate compliance. Weekly gas analysis shall be performed using Draeger tubes and quarterly analysis using ASTM method D3246 or double GC for H2S and mercaptans. First of the weekly gas analyses shall be done using laboratory analysis. [District Rules 1081, 2201, and 4320] Federally Enforceable Through Title V Permit
- 20. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rules 1081, 2201, and 4320] Federally Enforceable Through Title V Permit
- 21. The following calculation shall be used to show compliance with the SOx daily emissions limit: lb SOx emitted/day = (volume of gas incinerated per day, in scf) x (ppm H2S prior to incineration) x 0.00000017. [District Rule 2201] Federally Enforceable Through Title V Permit

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- 22. Records of weekly and quarterly test results for sulfur content, amounts of natural gas and waste gas combusted (in scf), higher heating values of natural gas and waste gas, and calculations to verify compliance with the sulfur SLC limit shared by units '-7, '-20, and '-24 shall be retained on-site for a period of at least five years and made readily available for District inspection upon request. [District Rules 1070, 2201, and 4320] Federally Enforceable Through Title V Permit
- 23. Pursuant to Rule 4320, the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
- 24. The permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contacts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit
- 25. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit
- 26. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit

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Location: S-3088-7-11 : Oct 25 2022 9:36AM -- MUTHANAN

PERMIT UNIT: S-3088-8-18

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

THERMALLY ENHANCED OIL RECOVERY OPERATION WITH 150 STEAM ENHANCED CRUDE OIL PRODUCTION WELLS AND 665 SCFM AIR ASSIST STANDBY FLARE, WITH VAPOR PIPING FROM TANKS S-3088-9 THROUGH -16, -21 AND -22, GAS/LIQUID SEPARATORS, COMPRESSORS, HEAT EXCHANGERS, CONDENSATE PUMPS, FOUR SULFATREAT HP PACKED VESSELS, AND INCINERATION IN STEAM GENERATORS S-3088-7, '-20, OR '-24, OR STANDBY FLARE

PERMIT UNIT REQUIREMENTS

- VOC content of the vapor control system gas shall not exceed 10% by weight as determined in accordance with the
 latest revision of ASTM Methods D1945 for gases and South Coast AQMD Method 304-91 or the latest revision of
 ASTM Method E-168, E-169 or E-260 for liquids. [District Rules 2201 and 4401] Federally Enforceable Through Title
 V Permit
- 2. Thermally enhanced oil recovery operation shall include no more than 150 cyclically steam enhanced wells. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. Liquid from separators, heat exchangers, condensate collection vessels, compressor knockouts, and flare shall be piped only in closed piping to tanks with vapor control. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. Vapor control system gas shall be incinerated in steam generator S-3088-7, S-3088-20, S-3088-24 or standby John Zink model STF-LH-336-6/15 air assisted flare when steam generators are not operational. Flare shall be equipped with automatic re-ignition system. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. Flare shall operate smokelessly (i.e. visible emissions shall be less than 1/4 Ringelmann). [District Rule 4101] Federally Enforceable Through Title V Permit
- 6. No more than 0.958 MM scf/day of TEOR and/or TVR gas shall be incinerated in standby flare. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. Standby flare emissions shall not exceed any of the following limits: NOx: 0.068 lb/MMBtu, PM10: 0.008 lb/MMBtu, CO: 0.370 lb/MMBtu or VOC: 0.063 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. SOx emissions from flare shall not exceed 207.6 lb/day based on mass balance calculation with H2S content and daily volume of the TEOR and/or TVR gas combusted. [District Rule 2201] Federally Enforceable Through Title V Permit
- 9. When the standby flare is being used, daily records shall be maintained of scrubbed vapor control system gas volume flow rate and sulfur content. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. 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
- 11. 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

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Location: HEAVY OIL WESTERN STATIONARY SOURCE,CA

- 12. 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
- 13. The inspection and re-inspection requirements set forth in Sections 5.8.1 through 5.8.5 of Rule 4401 shall not apply to components exclusively handling gas/vapor or liquid with a VOC content of 10% by weight or less [District Rule 4401] Federally Enforceable Through Title V Permit
- 14. The operator shall be in violation of Rule 4401 if any District inspection, or any operator inspection that is required by 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
- 15. Operator shall conduct quarterly sampling of vapor recovery system gas. If vapor recovery system gas is shown to be less than 10% VOC by weight for 8 consecutive quarterly sampling, sampling shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. The sulfur content of the scrubbed vapor control system gas shall be tested at least monthly. [District Rule 1081] Federally Enforceable Through Title V Permit
- 17. The sulfur content of the vapor control system gas being combusted in the flare shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
- 18. The flare flame shall be present at all times when combustible gases are vented through the flare. [District Rule 4311] Federally Enforceable Through Title V Permit
- 19. The flare outlet shall be equipped with an automatic ignition system, or, shall operate with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rule 4311] Federally Enforceable Through Title V Permit
- 20. Except for flares equipped with a flow-sensing ignition system, a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present shall be installed and operated. [District Rule 4311] Federally Enforceable Through Title V Permit
- 21. Flares that use flow-sensing automatic ignition systems and which do not use a continuous flame pilot shall use purge gas for purging. [District Rule 4311] Federally Enforceable Through Title V Permit
- 22. Permittee shall maintain a record of all vapor control system gas sample analysis conducted for VOC and sulfur content, the volume flow rate to the flare, and a current listing of the steam enhanced wells with casing vents connected to the well vent collection and control system. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. All records shall be maintained for a period of at least five years and made available for District inspection upon request. [District Rule 1070]

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Facility Name: TRC CYPRESS GROUP LLC HEAVY OIL WESTERN STATIONARY SOURCE

Location: S-3088-8-18 : Oct 25 2022 9:37AM -- MUTHANAN

PERMIT UNIT: S-3088-9-5

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

1500 BBL FIXED ROOF CONSTANT LEVEL CRUDE OIL WASH TANK (1000-01) SERVED BY VAPOR CONTROL

SYSTEM LISTED ON S-3088-8

PERMIT UNIT REQUIREMENTS

- The tank shall be equipped with a vapor control system consisting of a closed system that collects VOCs from the storage tank and a VOC control device. The vapor control system shall be APCO-approved. Collected vapors shall be directed to approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in section 6.4 of District Rule 4623. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC's collected from tank shall vent only to vapor control system S-3088-8. [District Rule 2201] Federally Enforceable Through Title V Permit
- This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all 3. storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
- Maximum VOC content of vapor in the tank vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall conduct true vapor pressure (TVP) and API gravity testing of fluid stored by tanks S-3088-8 through '-16 and '-21 at least once every 24 months during summer (July- September), and/or whenever there is a change in the source or type of organic liquid stored in tanks S-3088-8 through '-16 and '-21 in order to maintain exemption form the rule. Sample for TVP analysis shall be taken from tank with highest storage temperature. [District Rule 4623] Federally Enforceable Through Title V Permit
- The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
- For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
- The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
- Permittee shall submit the records of TVP and API gravity testing to the Compliance Section of the Southern Region of the SJVAPCD within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit

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

S-3088-9-5 : Oct 25 2022 9:37AM -- MUTHANAM

Facility Name: TRC CYPRESS GROUP LLC HEAVY OIL WESTERN STATIONARY SOURCE, CA Location:

- 10. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] Federally Enforceable Through Title V Permit
- 11. Operator shall conduct quarterly gas sampling of gas from vapor recovery system serving tanks S-3088-8 through '-16 and '-21 upstream of TVR compressor # 1(prior to connection to any other vapor control system). If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. A gas leak is defined as a reading in excess of 10,000 ppmy, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2201] Federally Enforceable Through Title V Permit

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

Facility Name: TRC CYPRESS GROUP LLC

HEAVY OIL WESTERN STATIONARY SOURCE, CA S-3088-9-5 : Oct 25 2022 9:37AM -- MUTHANAM

Location:

- 21. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. Permittee shall maintain records of the VOC content of vapor in the tank vapor control system, including date and test results. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4623] Federally Enforceable Through Title V Permit

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

Facility Name: TRC CYPRESS GROUP LLC Location: HEAVY OIL WESTERN STATIONARY SOURCE

PERMIT UNIT: S-3088-10-5

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

1000 BBL FIXED ROOF CRUDE OIL SHIPPING/REJECT TANK (T-1000-2) SERVED BY VAPOR CONTROL SYSTEM

LISTED ON S-3088-8

PERMIT UNIT REQUIREMENTS

- The tank shall be equipped with a vapor control system consisting of a closed system that collects VOCs from the storage tank and a VOC control device. The vapor control system shall be APCO-approved. Collected vapors shall be directed to approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in section 6.4 of District Rule 4623. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC's collected from tank shall vent only to vapor control system S-3088-8. [District Rule 2201] Federally Enforceable Through Title V Permit
- This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all 3. storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
- Maximum VOC content of vapor in the tank vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall conduct true vapor pressure (TVP) and API gravity testing of fluid stored by tanks S-3088-8 through '-16 and '-21 at least once every 24 months during summer (July- September), and/or whenever there is a change in the source or type of organic liquid stored in tanks S-3088-8 through '-16 and '-21 in order to maintain exemption form the rule. Sample for TVP analysis shall be taken from tank with highest storage temperature. [District Rule 4623] Federally Enforceable Through Title V Permit
- The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
- For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
- The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
- Permittee shall submit the records of TVP and API gravity testing to the Compliance Section of the Southern Region of the SJVAPCD within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit

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

Facility Name: TRC CYPRESS GROUP LLC

S-3088-10-5 : Oct 25 2022 9:37AM -- MUTHANAN

HEAVY OIL WESTERN STATIONARY SOURCE, CA Location:

- 10. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] Federally Enforceable Through Title V Permit
- 11. Operator shall conduct quarterly gas sampling of gas from vapor recovery system serving tanks S-3088-8 through '-16 and '-21 upstream of TVR compressor # 1(prior to connection to any other vapor control system). If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. A gas leak is defined as a reading in excess of 10,000 ppmy, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2201] Federally Enforceable Through Title V Permit

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

Facility Name: TRC CYPRESS GROUP LLC

HEAVY OIL WESTERN STATIONARY SOURCE, CA Location: S-3088-10-5 : Oct 25 2022 9:37AM -- MUTHANAN

- 21. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. Permittee shall maintain records of the VOC content of vapor in the tank vapor control system, including date and test results. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4623] Federally Enforceable Through Title V Permit

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

Facility Name: TRC CYPRESS GROUP LLC HEAVY OIL WESTERN STATIONARY SOURCE

Location: S-3088-10-5 : Oct 25 2022 9:37AM -- MUTHANAM

PERMIT UNIT: S-3088-11-5

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

1000 BBL FIXED ROOF CRUDE OIL SHIPPING/REJECT TANK (T-1000-03) SERVED BY VAPOR CONTROL SYSTEM

LISTED ON S-3088-8

PERMIT UNIT REQUIREMENTS

- The tank shall be equipped with a vapor control system consisting of a closed system that collects VOCs from the storage tank and a VOC control device. The vapor control system shall be APCO-approved. Collected vapors shall be directed to approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in section 6.4 of District Rule 4623. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC's collected from tank shall vent only to vapor control system S-3088-8. [District Rule 2201] Federally Enforceable Through Title V Permit
- This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all 3. storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
- Maximum VOC content of vapor in the tank vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall conduct true vapor pressure (TVP) and API gravity testing of fluid stored by tanks S-3088-8 through '-16 and '-21 at least once every 24 months during summer (July- September), and/or whenever there is a change in the source or type of organic liquid stored in tanks S-3088-8 through '-16 and '-21 in order to maintain exemption form the rule. Sample for TVP analysis shall be taken from tank with highest storage temperature. [District Rule 4623] Federally Enforceable Through Title V Permit
- The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
- For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
- The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
- Permittee shall submit the records of TVP and API gravity testing to the Compliance Section of the Southern Region of the SJVAPCD within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit

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

S-3088-11-5 : Oct 25 2022 9:37AM -- MUTHANAN

Facility Name: TRC CYPRESS GROUP LLC HEAVY OIL WESTERN STATIONARY SOURCE, CA Location:

- 10. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] Federally Enforceable Through Title V Permit
- 11. Operator shall conduct quarterly gas sampling of gas from vapor recovery system serving tanks S-3088-8 through '-16 and '-21 upstream of TVR compressor # 1(prior to connection to any other vapor control system). If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. A gas leak is defined as a reading in excess of 10,000 ppmy, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2201] Federally Enforceable Through Title V Permit

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

Facility Name: TRC CYPRESS GROUP LLC

HEAVY OIL WESTERN STATIONARY SOURCE, CA Location:

S-3088-11-5 : Oct 25 2022 9:37AM -- MUTHANAM

- 21. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. Permittee shall maintain records of the VOC content of vapor in the tank vapor control system, including date and test results. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4623] Federally Enforceable Through Title V Permit

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

Facility Name: TRC CYPRESS GROUP LLC

Location: HEAVY OIL WESTERN STATIONARY SOURCES-3088-11-5: Oct 25 2022 9:37AM -- MUTHANAM

PERMIT UNIT: S-3088-12-5

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

1000 BBL FIXED ROOF CRUDE OIL SHIPPING/REJECT TANK (T-1000-04) SERVED BY VAPOR CONTROL SYSTEM

LISTED ON S-3088-8

PERMIT UNIT REQUIREMENTS

- The tank shall be equipped with a vapor control system consisting of a closed system that collects VOCs from the storage tank and a VOC control device. The vapor control system shall be APCO-approved. Collected vapors shall be directed to approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in section 6.4 of District Rule 4623. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC's collected from tank shall vent only to vapor control system S-3088-8. [District Rule 2201] Federally Enforceable Through Title V Permit
- This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all 3. storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
- Maximum VOC content of vapor in the tank vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall conduct true vapor pressure (TVP) and API gravity testing of fluid stored by tanks S-3088-8 through '-16 and '-21 at least once every 24 months during summer (July- September), and/or whenever there is a change in the source or type of organic liquid stored in tanks S-3088-8 through '-16 and '-21 in order to maintain exemption form the rule. Sample for TVP analysis shall be taken from tank with highest storage temperature. [District Rule 4623] Federally Enforceable Through Title V Permit
- The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
- For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
- The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
- Permittee shall submit the records of TVP and API gravity testing to the Compliance Section of the Southern Region of the SJVAPCD within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit

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

Facility Name: TRC CYPRESS GROUP LLC

HEAVY OIL WESTERN STATIONARY SOURCE, CA Location: S-3088-12-5 : Oct 25 2022 9:37AM -- MUTHANAN

- 10. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] Federally Enforceable Through Title V Permit
- 11. Operator shall conduct quarterly gas sampling of gas from vapor recovery system serving tanks S-3088-8 through '-16 and '-21 upstream of TVR compressor # 1(prior to connection to any other vapor control system). If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2201] Federally Enterceable Through Title V Permit

Facility Name: TRC CYPRESS GROUP LLC

Location: HEAVY OIL WESTERN STATIONARY SOURCE CAS-3088-12-5: Oct 25 2022 9:37AM -- MUTHANAM

- 21. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. Permittee shall maintain records of the VOC content of vapor in the tank vapor control system, including date and test results. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4623] Federally Enforceable Through Title V Permit

Facility Name: TRC CYPRESS GROUP LLC

Location: HEAVY OIL WESTERN STATIONARY SOURCE S-3088-12-5 : Oct 25 2022 9:37AM -- MUTHANAM

PERMIT UNIT: S-3088-13-5

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

1000 BBL FIXED ROOF CRUDE OIL SHIPPING/REJECT TANK (T-1000-05) SERVED BY VAPOR CONTROL LISTED

ON S-3088-8

PERMIT UNIT REQUIREMENTS

- 1. The tank shall be equipped with a vapor control system consisting of a closed system that collects VOCs from the storage tank and a VOC control device. The vapor control system shall be APCO-approved. Collected vapors shall be directed to approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in section 6.4 of District Rule 4623. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. VOC's collected from tank shall vent only to vapor control system S-3088-8. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
- 4. Maximum VOC content of vapor in the tank vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. Permittee shall conduct true vapor pressure (TVP) and API gravity testing of fluid stored by tanks S-3088-8 through '-16 and '-21 at least once every 24 months during summer (July- September), and/or whenever there is a change in the source or type of organic liquid stored in tanks S-3088-8 through '-16 and '-21 in order to maintain exemption form the rule. Sample for TVP analysis shall be taken from tank with highest storage temperature. [District Rule 4623] Federally Enforceable Through Title V Permit
- 6. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
- 7. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
- 8. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
- 9. Permittee shall submit the records of TVP and API gravity testing to the Compliance Section of the Southern Region of the SJVAPCD within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit

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

Facility Name: TRC CYPRESS GROUP LLC
Location: HEAVY OIL WESTERN STATIONARY SOURCE, CA

S-3088-13-5 : Oct 25 2022 9:37AM -- MUTHANAN

- 10. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] Federally Enforceable Through Title V Permit
- 11. Operator shall conduct quarterly gas sampling of gas from vapor recovery system serving tanks S-3088-8 through '-16 and '-21 upstream of TVR compressor # 1(prior to connection to any other vapor control system). If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. A gas leak is defined as a reading in excess of 10,000 ppmy, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2201] Federally Enforceable Through Title V Permit

Facility Name: TRC CYPRESS GROUP LLC

HEAVY OIL WESTERN STATIONARY SOURCE, CA Location: S-3088-13-5 : Oct 25 2022 9:37AM -- MUTHANAN

- 21. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. Permittee shall maintain records of the VOC content of vapor in the tank vapor control system, including date and test results. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4623] Federally Enforceable Through Title V Permit

Facility Name: TRC CYPRESS GROUP LLC

Location: HEAVY OIL WESTERN STATIONARY SOURCE S-3088-13-5 : Oct 25 2022 9:37AM -- MUTHANAM

PERMIT UNIT: S-3088-14-6

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

200 BBL FIXED ROOF CRUDE OIL SLOP TANK (T-3000-01) SERVED BY VAPOR CONTROL SYSTEM SHARED WITH

S-3088-8

PERMIT UNIT REQUIREMENTS

- The tank shall be equipped with a vapor control system consisting of a closed system that collects VOCs from the storage tank and a VOC control device. The vapor control system shall be APCO-approved. Collected vapors shall be directed to approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in section 6.4 of District Rule 4623. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC's collected from tank shall vent only to vapor control system S-3088-8. [District Rule 2201] Federally Enforceable Through Title V Permit
- This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all 3. storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
- Maximum VOC content of vapor in the tank vapor control system shall not exceed 10% by weight [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall conduct true vapor pressure (TVP) and API gravity testing of fluid stored by tanks S-3088-8 through '-16 and '-21 at least once every 24 months during summer (July- September), and/or whenever there is a change in the source or type of organic liquid stored in tanks S-3088-8 through '-16 and '-21 in order to maintain exemption form the rule. Sample for TVP analysis shall be taken from tank with highest storage temperature. [District Rule 4623] Federally Enforceable Through Title V Permit
- The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
- For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
- The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
- Permittee shall submit the records of TVP and API gravity testing to the Compliance Section of the Southern Region of the SJVAPCD within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit

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

Facility Name: TRC CYPRESS GROUP LLC

HEAVY OIL WESTERN STATIONARY SOURCE, CA Location: S-3088-14-6 : Oct 25 2022 9:37AM -- MUTHANAN

- 10. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] Federally Enforceable Through Title V Permit
- 11. Operator shall conduct quarterly gas sampling of gas from vapor recovery system serving tanks S-3088-8 through '-16 and '-21 upstream of TVR compressor # 1(prior to connection to any other vapor control system). If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2201] Federally Enterceable Through Title V Permit

Facility Name: TRC CYPRESS GROUP LLC

S-3088-14-6 : Oct 25 2022 9:37AM -- MUTHANAM

- 21. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. Permittee shall maintain records of the VOC content of vapor in the tank vapor control system, including date and test results. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4623] Federally Enforceable Through Title V Permit

Facility Name: TRC CYPRESS GROUP LLC HEAVY OIL WESTERN STATIONARY SOURCE

Location: S-3088-14-6 : Oct 25 2022 9:37AM -- MUTHANAM

PERMIT UNIT: S-3088-15-6

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

250 BBL FIXED ROOF CRUDE OIL SLOP TANK (T-3000-02) SERVED BY VAPOR CONTROL SYSTEM SHARED WITH

S-3088-8

PERMIT UNIT REQUIREMENTS

- The tank shall be equipped with a vapor control system consisting of a closed system that collects VOCs from the storage tank and a VOC control device. The vapor control system shall be APCO-approved. Collected vapors shall be directed to approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in section 6.4 of District Rule 4623. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC's collected from tank shall vent only to vapor control system S-3088-8. [District Rule 2201] Federally Enforceable Through Title V Permit
- This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all 3. storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
- Maximum VOC content of vapor in the tank vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall conduct true vapor pressure (TVP) and API gravity testing of fluid stored by tanks S-3088-8 through '-16 and '-21 at least once every 24 months during summer (July- September), and/or whenever there is a change in the source or type of organic liquid stored in tanks S-3088-8 through '-16 and '-21 in order to maintain exemption form the rule. Sample for TVP analysis shall be taken from tank with highest storage temperature. [District Rule 4623] Federally Enforceable Through Title V Permit
- The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
- For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
- The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
- Permittee shall submit the records of TVP and API gravity testing to the Compliance Section of the Southern Region of the SJVAPCD within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit

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

S-3088-15-6 : Oct 25 2022 9:37AM -- MUTHANAN

Facility Name: TRC CYPRESS GROUP LLC HEAVY OIL WESTERN STATIONARY SOURCE, CA Location:

- 10. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] Federally Enforceable Through Title V Permit
- 11. Operator shall conduct quarterly gas sampling of gas from vapor recovery system serving tanks S-3088-8 through '-16 and '-21 upstream of TVR compressor # 1(prior to connection to any other vapor control system). If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. A gas leak is defined as a reading in excess of 10,000 ppmy, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2201] Federally Enforceable Through Title V Permit

Facility Name: TRC CYPRESS GROUP LLC

HEAVY OIL WESTERN STATIONARY SOURCE, CA Location:

S-3088-15-6 : Oct 25 2022 9:37AM -- MUTHANAN

- 21. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. Permittee shall maintain records of the VOC content of vapor in the tank vapor control system, including date and test results. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4623] Federally Enforceable Through Title V Permit

Facility Name: TRC CYPRESS GROUP LLC

Location: HEAVY OIL WESTERN STATIONARY SOURCES-3088-15-6: Oct 25 2022 9:37AM -- MUTHANAM

PERMIT UNIT: S-3088-16-6

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

1000 BBL FIXED ROOF CRUDE OIL SLOP TANK (T-3000-03) SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-

3088-8

PERMIT UNIT REQUIREMENTS

- The tank shall be equipped with a vapor control system consisting of a closed system that collects VOCs from the storage tank and a VOC control device. The vapor control system shall be APCO-approved. Collected vapors shall be directed to approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in section 6.4 of District Rule 4623. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC's collected from tank shall vent only to vapor control system S-3088-8. [District Rule 2201] Federally Enforceable Through Title V Permit
- This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all 3. storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
- Maximum VOC content of vapor in the tank vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall conduct true vapor pressure (TVP) and API gravity testing of fluid stored by tanks S-3088-8 through '-16 and '-21 at least once every 24 months during summer (July- September), and/or whenever there is a change in the source or type of organic liquid stored in tanks S-3088-8 through '-16 and '-21 in order to maintain exemption form the rule. Sample for TVP analysis shall be taken from tank with highest storage temperature. [District Rule 4623] Federally Enforceable Through Title V Permit
- The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
- For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
- The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
- Permittee shall submit the records of TVP and API gravity testing to the Compliance Section of the Southern Region of the SJVAPCD within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit

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

Location: S-3088-16-6 : Oct 25 2022 9:37AM -- MUTHANAN

Facility Name: TRC CYPRESS GROUP LLC HEAVY OIL WESTERN STATIONARY SOURCE, CA

- 10. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] Federally Enforceable Through Title V Permit
- 11. Operator shall conduct quarterly gas sampling of gas from vapor recovery system serving tanks S-3088-8 through '-16 and '-21 upstream of TVR compressor # 1(prior to connection to any other vapor control system). If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. A gas leak is defined as a reading in excess of 10,000 ppmy, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2201] Federally Enforceable Through Title V Permit

Facility Name: TRC CYPRESS GROUP LLC

HEAVY OIL WESTERN STATIONARY SOURCE, CA Location: S-3088-16-6 : Oct 25 2022 9:37AM -- MUTHANAN

- 21. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. Permittee shall maintain records of the VOC content of vapor in the tank vapor control system, including date and test results. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4623] Federally Enforceable Through Title V Permit

Facility Name: TRC CYPRESS GROUP LLC

Location: HEAVY OIL WESTERN STATIONARY SOURCES-3088-16-6: Oct 25 2022 9:37AM -- MUTHANAM

PERMIT UNIT: S-3088-20-9

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR C.E. NATCO NATURAL GAS/WASTE GAS-FIRED STEAM GENERATOR WITH A NORTH AMERICAN MODEL MAGNA-FLAME G-LE, ULTRA LOW NOX BURNER AND FLUE GAS RECIRCULATION - CYPRESS LEASE

PERMIT UNIT REQUIREMENTS

- All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- 3. Combined SOx emissions from steam generators S-3088-7, '-20, and '-24 shall not exceed 328.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- Fuel gas sulfur content shall not exceed 1 gr S/100 scf unless SOx is reduced by 95% or to 9 ppmv SOx @ 3% O2 in exhaust with scrubber. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
- Emissions from the natural gas-fired unit shall not exceed any of the following limits: 14 ppmvd NOx @ 3% O2 or 0.017 lb-NOx/MMBtu, 0.0076 lb-PM10/MMBtu, 47.5 ppmvd CO @ 3% O2 or 0.035 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
- The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306] 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.

Facility Name: TRC CYPRESS GROUP LLC

S-3088-20-9 : Oct 25 2022 9:37AM -- MUTHANAN

HEAVY OIL WESTERN STATIONARY SOURCE, CA Location:

- The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 10. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 11. Source testing to measure NOx and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 12. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 13. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 14. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 15. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 16. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 17. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 18. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
- 19. Permittee shall determine sulfur content of combusted gas weekly for eight consecutive weeks. After demonstrating compliance for eight consecutive weeks testing may be conducted on a quarterly basis. Weekly sulfur testing shall resume if quarterly testing does not indicate compliance. Weekly gas analysis shall be performed using Draeger tubes and quarterly analysis using ASTM method D3246 or double GC for H2S and mercaptans. First of the weekly gas analyses shall be done using laboratory analysis. [District Rules 1081, 2201, and 4320] Federally Enforceable Through Title V Permit
- 20. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rules 1081, 2201, and 4320] Federally Enforceable Through Title V Permit
- 21. The following calculation shall be used to show compliance with the SOx daily emissions limit: 1b SOx emitted/day = (volume of gas incinerated per day, in scf) x (ppm H2S prior to incineration) x 0.00000017. [District Rule 2201] Federally Enforceable Through Title V Permit

Facility Name: TRC CYPRESS GROUP LLC HEAVY OIL WESTERN STATIONARY SOURCE CA

Location: S-3088-20-9 : Oct 25 2022 9:37AM -- MUTHANAN

- 22. Records of weekly and quarterly test results for sulfur content, daily amounts of natural gas and waste gas combusted (in scf), higher heating values of natural gas and waste gas, and calculations to verify compliance with the sulfur SLC limit shared by units '-7, '-20, and '-24 shall be retained on-site for a period of at least five years and made readily available for District inspection upon request. [District Rules 1070, 2201, and 4320] Federally Enforceable Through Title V Permit
- 23. Pursuant to Rule 4320, the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
- 24. The permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contacts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit
- 25. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit
- 26. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit

Facility Name: TRC CYPRESS GROUP LLC
Location: HEAVY OIL WESTERN STATIONARY SOURCE

S-3088-20-9 : Oct 25 2022 9:37AM -- MUTHANAN

PERMIT UNIT: S-3088-21-5

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

1500 BBL CONSTANT LEVEL FIXED ROOF CRUDE OIL WASH TANK SERVED BY VAPOR CONTROL SYSTEM

SHARED WITH S-3088-8

PERMIT UNIT REQUIREMENTS

- 1. The tank shall be equipped with a vapor control system consisting of a closed system that collects VOCs from the storage tank and a VOC control device. The vapor control system shall be APCO-approved. Collected vapors shall be directed to approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in section 6.4 of District Rule 4623. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. VOC's collected from tank shall vent only to vapor control system S-3088-8. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
- 4. Maximum VOC content of vapor in the tank vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. Permittee shall conduct true vapor pressure (TVP) and API gravity testing of fluid stored by tanks S-3088-8 through '-16 and '-21 at least once every 24 months during summer (July- September), and/or whenever there is a change in the source or type of organic liquid stored in tanks S-3088-8 through '-16 and '-21 in order to maintain exemption form the rule. Sample for TVP analysis shall be taken from tank with highest storage temperature. [District Rule 4623] Federally Enforceable Through Title V Permit
- 6. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
- 7. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
- 8. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
- 9. Permittee shall submit the records of TVP and API gravity testing to the Compliance Section of the Southern Region of the SJVAPCD within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit

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

S-3088-21-5 : Oct 25 2022 9:37AM -- MUTHANAN

Facility Name: TRC CYPRESS GROUP LLC
Location: HEAVY OIL WESTERN STATIONARY SOURCE, CA

- 10. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] Federally Enforceable Through Title V Permit
- 11. Operator shall conduct quarterly gas sampling of gas from vapor recovery system serving tanks S-3088-8 through '-16 and '-21 upstream of TVR compressor # 1(prior to connection to any other vapor control system). If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2201] Federally Enterceable Through Title V Permit

Facility Name: TRC CYPRESS GROUP LLC

Location: HEAVY OIL WESTERN STATIONARY SOURCE CA

S-3088-21-5 : Oct 25 2022 9:37AM -- MUTHANAN

- 21. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. Permittee shall maintain records of the VOC content of vapor in the tank vapor control system, including date and test results. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4623] Federally Enforceable Through Title V Permit

Facility Name: TRC CYPRESS GROUP LLC

Location: HEAVY OIL WESTERN STATIONARY SOURCE S-3088-21-5 : Oct 25 2022 9:37AM -- MUTHANAM

PERMIT UNIT: S-3088-24-7

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR C.E. NATCO NATURAL GAS/WASTE GAS FIRED STEAM GENERATOR (#92 DIS# 27572-80) WITH NORTH AMERICAN MAGNA FLAME GLE ULTRA LOW NOX BURNER

PERMIT UNIT REQUIREMENTS

- 1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- 3. Combined SOx emissions from steam generators S-3088-7, '-20, and '-24 shall not exceed 328.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. Fuel gas sulfur content shall not exceed 1 gr S/100 scf unless SOx is reduced by 95% or to 9 ppmv SOx @ 3% O2 in exhaust with scrubber. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
- 5. Emission rates from the unit shall not exceed any of the following limits: 0.058 lb-PM10/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
- 6. Except during startup and shutdown, emission rates from the unit shall not exceed any of the following limits: 14 ppmv NOx @ 3% O2 or 47 ppmv CO @ 3% O2. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
- 7. Emission rates during startup and shutdown shall not exceed: NO2 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4301 and 4405] Federally Enforceable Through Title V Permit
- 8. Emission rates shall not exceed any of the following: NOx (as NO2): 54.0 lb/day or 9855 lb/year, CO: 52.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 9. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 10. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 11. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306] 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.

Facility Name: TRC CYPRESS GROUP LLC

S-3088-24-7 : Oct 25 2022 9:37AM -- MUTHANAM

Location: HEAVY OIL WESTERN STATIONARY SOURCE,CA

- 12. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 13. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 14. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 15. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 16. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 17. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 18. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
- 20. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 21. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 22. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 23. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

Facility Name: TRC CYPRESS GROUP LLC

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- 24. Permittee shall determine sulfur content of combusted gas weekly for eight consecutive weeks. After demonstrating compliance for eight consecutive weeks testing may be conducted on a quarterly basis. Weekly sulfur testing shall resume if quarterly testing does not indicate compliance. Weekly gas analysis shall be performed using Draeger tubes and quarterly analysis using ASTM method D3246 or double GC for H2S and mercaptans. First of the weekly gas analyses shall be done using laboratory analysis. [District Rules 1081, 2201, and 4320] Federally Enforceable Through Title V Permit
- 25. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rules 1081, 2201, and 4320] Federally Enforceable Through Title V Permit
- 26. The following calculation shall be used to show compliance with the SOx daily emissions limit: lb SOx emitted/day = (volume of gas incinerated per day, in scf) x (ppm H2S prior to incineration) x 0.00000017. [District Rule 2201] Federally Enforceable Through Title V Permit
- 27. Records of weekly and quarterly test results for sulfur content, daily amounts of natural gas and waste gas combusted (in scf), higher heating values of natural gas and waste gas, and calculations to verify compliance with the sulfur SLC limit shared by units '-7, '-20, and '-24 shall be retained on-site for a period of at least five years and made readily available for District inspection upon request. [District Rules 1070, 2201, and 4320] Federally Enforceable Through Title V Permit
- 28. Pursuant to Rule 4320, the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
- 29. The permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contacts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit
- 30. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit
- 31. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit

Facility Name: TRC CYPRESS GROUP LLC HEAVY OIL WESTERN STATIONARY SOURCE

Location: S-3088-24-7 : Oct 25 2022 9:37AM -- MUTHANAN

ATTACHMENT B

Previous Title V Operating Permit

FACILITY: S-3088-0-3 **EXPIRATION DATE:** 05/31/2022

FACILITY-WIDE REQUIREMENTS

- 1. Facilities S-3088 and S-2622 are included in the same stationary source. [District Rule 2201] Federally Enforceable Through Title V Permit
- To maintain status as a small producer, permittee's crude oil production shall average less than 6000 bbl/day from all operations within Kern County and permittee shall not engage in refining, transporting, or marketing of refined petroleum products. [District Rule 2080] Federally Enforceable Through Title V Permit
- No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 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, County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
- 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, County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
- 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] Federally Enforceable Through Title V Permit
- 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, and 2020] Federally Enforceable Through Title V Permit
- 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, 2080; and 2520] Federally Enforceable Through Title V Permit
- 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
- 10. 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]

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: TRC CYPRESS GROUP LLC

Location: HEAVY OIL WESTERN STATIONARY SOURCE, CA \$3088-0-3: Oct 10 2022 7:46AM -- MUTHANAM

- 11. 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] Federally Enforceable Through Title V Permit
- 12. 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] Federally Enforceable Through Title V Permit
- 13. 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] Federally Enforceable Through Title V Permit
- 14. 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, 1100] Federally Enforceable Through Title V Permit
- 15. 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] Federally Enforceable Through Title V Permit
- 16. 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] Federally Enforceable Through Title V Permit
- 17. 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] Federally Enforceable Through Title V Permit
- 18. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520] Federally Enforceable Through Title V Permit
- 19. 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] Federally Enforceable Through Title V Permit
- 20. 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] Federally Enforceable Through Title V Permit
- 21. 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] Federally Enforceable Through Title V Permit
- 22. 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] Federally Enforceable Through Title V Permit
- 23. 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] Federally Enforceable Through Title V Permit

- 24. 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] Federally Enforceable Through Title V Permit
- 25. 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
- 26. 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] Federally Enforceable Through Title V Permit
- 27. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601] Federally Enforceable Through Title V Permit
- 28. 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] Federally Enforceable Through Title V Permit
- 29. 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] Federally Enforceable Through Title V Permit
- 30. 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
- 31. 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
- 32. 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 Rule 8021 and 8011] Federally Enforceable Through Title V Permit
- 33. 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 Rule 8031 and 8011] Federally Enforceable Through Title V Permit
- 34. 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 Rule 8041 and 8011] Federally Enforceable Through Title V Permit
- 35. 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 Rule 8051 and 8011] Federally Enforceable Through Title V Permit
- 36. 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 Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit

- 37. 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 Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
- 38. 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
- 39. 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] Federally Enforceable Through Title V Permit
- 40. 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] Federally Enforceable Through Title V Permit
- 41. 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] Federally Enforceable Through Title V Permit
- 42. 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] Federally Enforceable Through Title V Permit
- 43. 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] Federally Enforceable Through Title V Permit
- 44. On September 30, 2012, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, 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

EXPIRATION DATE: 05/31/2022 **PERMIT UNIT:** S-3088-7-10

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR NATURAL GAS/WASTE GAS FIRED STEAM GENERATOR WITH NORTH AMERICAN MAGNA-FLAME G-LE ULTRA LOW NOX BURNER AND FLUE GAS RECIRCULATION (CYPRESS LEASE)

PERMIT UNIT REQUIREMENTS

- All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- Emissions rates from the unit shall not exceed any of the following limits: 14 ppmv NOx @ 3% O2 or 0.017 lb-NOx/MMBtu, 0.037 lb-PM10/MMBtu, 104 ppmv CO @ 3% O2 or 0.0757 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
- Combined SOx emissions from steam generators S-3088-7, '-20, and '-24 shall not exceed 328.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- Fuel gas sulfur content shall not exceed 1 gr S/100 scf unless SOx is reduced by 95% or to 9 ppmy SOx @ 3% O2 in exhaust with scrubber. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
- Source testing to measure NOx and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 10. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 11. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] 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.

Facility Name: TRC CYPRESS GROUP LLC

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- 12. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 13. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 14. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 15. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 16. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
- 17. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 18. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 19. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 20. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 21. Permittee shall determine sulfur content of combusted gas weekly for eight consecutive weeks. After demonstrating compliance for eight consecutive weeks testing may be conducted on a quarterly basis. Weekly sulfur testing shall resume if quarterly testing does not indicate compliance. Weekly gas analysis shall be performed using Draeger tubes and quarterly analysis using ASTM method D3246 or double GC for H2S and mercaptans. First of the weekly gas analyses shall be done using laboratory analysis. [District Rules 1081, 2201, and 4320] Federally Enforceable Through Title V Permit
- 22. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rules 1081, 2201, and 4320] Federally Enforceable Through Title V Permit PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

Facility Name: TRC CYPRESS GROUP LLC

Location: HEAVY OIL WESTERN STATIONARY SOURCE, CA

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- 23. The following calculation shall be used to show compliance with the SOx daily emissions limit: lb SOx emitted/day = (volume of gas incinerated per day, in scf) x (ppm H2S prior to incineration) x 0.00000017. [District Rule 2201] Federally Enforceable Through Title V Permit
- 24. Records of weekly and quarterly test results for sulfur content, amounts of natural gas and waste gas combusted (in scf), higher heating values of natural gas and waste gas, and calculations to verify compliance with the sulfur SLC limit shared by units '-7, '-20, and '-24 shall be retained on-site for a period of at least five years and made readily available for District inspection upon request. [District Rules 1070, 2201, and 4320] Federally Enforceable Through Title V Permit
- 25. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit
- 26. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
- 27. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contacts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit
- 28. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit
- 29. Pursuant to Rule 4320, beginning January 1, 2025 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in the December 17, 2020 version of Rule 4320. [District Rule 4320]

PERMIT UNIT: S-3088-8-16 EXPIRATION DATE: 05/31/2022

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

THERMALLY ENHANCED OIL RECOVERY OPERATION WITH 150 STEAM ENHANCED CRUDE OIL PRODUCTION WELLS AND 665 SCFM AIR ASSIST STANDBY FLARE, WITH VAPOR PIPING FROM TANKS S-3088-9 THROUGH -16, -21 AND -22, GAS/LIQUID SEPARATORS, COMPRESSORS, HEAT EXCHANGERS, CONDENSATE PUMPS, FOUR SULFATREAT HP PACKED VESSELS, AND INCINERATION IN STEAM GENERATORS S-3088-7, '-20, OR '-24, OR STANDBY FLARE

PERMIT UNIT REQUIREMENTS

- No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- VOC content of the vapor control system gas shall not exceed 10% by weight as determined in accordance with the latest revision of ASTM Methods D1945 for gases and South Coast AOMD Method 304-91 or the latest revision of ASTM Method E-168, E-169 or E-260 for liquids. [District Rules 2201 and 4401] Federally Enforceable Through Title V Permit
- 3. Thermally enhanced oil recovery operation shall include no more than 150 cyclically steam enhanced wells. [District Rule 2201] Federally Enforceable Through Title V Permit
- Liquid from separators, heat exchangers, condensate collection vessels, compressor knockouts, and flare shall be piped only in closed piping to tanks with vapor control. [District Rule 2201] Federally Enforceable Through Title V Permit
- Vapor control system gas shall be incinerated in steam generator S-3088-7, S-3088-20, S-3088-24 or standby John Zink model STF-LH-336-6/15 air assisted flare when steam generators are not operational. Flare shall be equipped with automatic re-ignition system. [District Rule 2201] Federally Enforceable Through Title V Permit
- Flare shall operate smokelessly (i.e. visible emissions shall be less than 1/4 Ringelmann). [District Rule 4101] Federally Enforceable Through Title V Permit
- No more than 0.958 MM scf/day of TEOR and/or TVR gas shall be incinerated in standby flare. [District Rule 2201] Federally Enforceable Through Title V Permit
- Standby flare emissions shall not exceed any of the following limits: NOx: 0.068 lb/MMBtu, PM10: 0.008 lb/MMBtu, CO: 0.370 lb/MMBtu or VOC: 0.063 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
- SOx emissions from flare shall not exceed 207.6 lb/day based on mass balance calculation with H2S content and daily volume of the TEOR and/or TVR gas combusted. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. When the standby flare is being used, daily records shall be maintained of scrubbed vapor control system gas volume flow rate and sulfur content. [District Rule 2201] Federally Enforceable Through Title V Permit
- 11. 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
- 12. 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.

Facility Name: TRC CYPRESS GROUP LLC

HEAVY OIL WESTERN STATIONARY SOURCE, CA Location:

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- 13. 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
- 14. The inspection and re-inspection requirements set forth in Sections 5.8.1 through 5.8.5 of Rule 4401 shall not apply to components exclusively handling gas/vapor or liquid with a VOC content of 10% by weight or less [District Rule 4401] Federally Enforceable Through Title V Permit
- 15. The operator shall be in violation of Rule 4401 if any District inspection, or any operator inspection that is required by 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
- 16. Operator shall conduct quarterly sampling of vapor recovery system gas. If vapor recovery system gas is shown to be less than 10% VOC by weight for 8 consecutive quarterly sampling, sampling shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. The sulfur content of the scrubbed vapor control system gas shall be tested at least monthly. [District Rule 1081] Federally Enforceable Through Title V Permit
- 18. The sulfur content of the vapor control system gas being combusted in the flare shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
- 19. The flare flame shall be present at all times when combustible gases are vented through the flare. [District Rule 4311] Federally Enforceable Through Title V Permit
- 20. The flare outlet shall be equipped with an automatic ignition system, or, shall operate with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rule 4311] Federally Enforceable Through Title V Permit
- 21. Except for flares equipped with a flow-sensing ignition system, a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present shall be installed and operated. [District Rule 4311] Federally Enforceable Through Title V Permit
- 22. Flares that use flow-sensing automatic ignition systems and which do not use a continuous flame pilot shall use purge gas for purging. [District Rule 4311] Federally Enforceable Through Title V Permit
- 23. Permittee shall maintain a record of all vapor control system gas sample analysis conducted for VOC and sulfur content, the volume flow rate to the flare, and a current listing of the steam enhanced wells with casing vents connected to the well vent collection and control system. [District Rule 2201] Federally Enforceable Through Title V Permit
- 24. All records shall be maintained for a period of at least five years and made available for District inspection upon request. [District Rule 1070]

PERMIT UNIT: S-3088-9-4 **EXPIRATION DATE:** 05/31/2022

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

1500 BBL FIXED ROOF CONSTANT LEVEL CRUDE OIL WASH TANK (1000-01) SERVED BY VAPOR CONTROL

SYSTEM LISTED ON S-3088-8

PERMIT UNIT REQUIREMENTS

- The tank shall be equipped with a vapor control system consisting of a closed system that collects VOCs from the storage tank and a VOC control device. The vapor control system shall be APCO-approved. Collected vapors shall be directed to approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in section 6.4 of District Rule 4623. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC's collected from tank shall vent only to vapor control system S-3088-8. [District Rule 2201] Federally Enforceable Through Title V Permit
- This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all 3. storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
- Maximum VOC content of vapor in the tank vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall conduct true vapor pressure (TVP) and API gravity testing of fluid stored by tanks S-3088-8 through '-16 and '-21 at least once every 24 months during summer (July- September), and/or whenever there is a change in the source or type of organic liquid stored in tanks S-3088-8 through '-16 and '-21 in order to maintain exemption form the rule. Sample for TVP analysis shall be taken from tank with highest storage temperature. [District Rule 4623] Federally Enforceable Through Title V Permit
- The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
- For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
- The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
- Permittee shall submit the records of TVP and API gravity testing to the Compliance Section of the Southern Region of the SJVAPCD within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit

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

Facility Name: TRC CYPRESS GROUP LLC

HEAVY OIL WESTERN STATIONARY SOURCE, CA Location:

- 10. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] Federally Enforceable Through Title V Permit
- 11. Operator shall conduct quarterly gas sampling of gas from vapor recovery system serving tanks S-3088-8 through '-16 and '-21 upstream of TVR compressor # 1(prior to connection to any other vapor control system). If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2201] Federally Enforceable Through Title V Permit

Facility Name: TRC CYPRESS GROUP LLC

Location: HEAVY OIL WESTERN STATIONARY SOURCE, CA

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- 21. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. Permittee shall maintain records of the VOC content of vapor in the tank vapor control system, including date and test results. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit

EXPIRATION DATE: 05/31/2022 **PERMIT UNIT:** S-3088-10-4

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

1000 BBL FIXED ROOF CRUDE OIL SHIPPING/REJECT TANK (T-1000-2) SERVED BY VAPOR CONTROL SYSTEM

LISTED ON S-3088-8

PERMIT UNIT REQUIREMENTS

- The tank shall be equipped with a vapor control system consisting of a closed system that collects VOCs from the storage tank and a VOC control device. The vapor control system shall be APCO-approved. Collected vapors shall be directed to approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in section 6.4 of District Rule 4623. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC's collected from tank shall vent only to vapor control system S-3088-8. [District Rule 2201] Federally Enforceable Through Title V Permit
- This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all 3. storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
- Maximum VOC content of vapor in the tank vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall conduct true vapor pressure (TVP) and API gravity testing of fluid stored by tanks S-3088-8 through '-16 and '-21 at least once every 24 months during summer (July- September), and/or whenever there is a change in the source or type of organic liquid stored in tanks S-3088-8 through '-16 and '-21 in order to maintain exemption form the rule. Sample for TVP analysis shall be taken from tank with highest storage temperature. [District Rule 4623] Federally Enforceable Through Title V Permit
- The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
- For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
- The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
- Permittee shall submit the records of TVP and API gravity testing to the Compliance Section of the Southern Region of the SJVAPCD within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit

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

Facility Name: TRC CYPRESS GROUP LLC

HEAVY OIL WESTERN STATIONARY SOURCE, CA Location:

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- 10. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] Federally Enforceable Through Title V Permit
- 11. Operator shall conduct quarterly gas sampling of gas from vapor recovery system serving tanks S-3088-8 through '-16 and '-21 upstream of TVR compressor # 1(prior to connection to any other vapor control system). If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2201] Federally Enforceable Through Title V Permit

Facility Name: TRC CYPRESS GROUP LLC

Location: HEAVY OIL WESTERN STATIONARY SOURCE, CA

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- 21. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. Permittee shall maintain records of the VOC content of vapor in the tank vapor control system, including date and test results. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit

S-3088-10-4 : Oct 10 2022 7:46AM -- MUTHANAM

EXPIRATION DATE: 05/31/2022 **PERMIT UNIT:** S-3088-11-4

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

1000 BBL FIXED ROOF CRUDE OIL SHIPPING/REJECT TANK (T-1000-03) SERVED BY VAPOR CONTROL SYSTEM

LISTED ON S-3088-8

PERMIT UNIT REQUIREMENTS

- The tank shall be equipped with a vapor control system consisting of a closed system that collects VOCs from the storage tank and a VOC control device. The vapor control system shall be APCO-approved. Collected vapors shall be directed to approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in section 6.4 of District Rule 4623. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC's collected from tank shall vent only to vapor control system S-3088-8. [District Rule 2201] Federally Enforceable Through Title V Permit
- This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all 3. storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
- Maximum VOC content of vapor in the tank vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall conduct true vapor pressure (TVP) and API gravity testing of fluid stored by tanks S-3088-8 through '-16 and '-21 at least once every 24 months during summer (July- September), and/or whenever there is a change in the source or type of organic liquid stored in tanks S-3088-8 through '-16 and '-21 in order to maintain exemption form the rule. Sample for TVP analysis shall be taken from tank with highest storage temperature. [District Rule 4623] Federally Enforceable Through Title V Permit
- The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
- For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
- The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
- Permittee shall submit the records of TVP and API gravity testing to the Compliance Section of the Southern Region of the SJVAPCD within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit

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

Facility Name: TRC CYPRESS GROUP LLC

HEAVY OIL WESTERN STATIONARY SOURCE, CA Location:

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- 10. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] Federally Enforceable Through Title V Permit
- 11. Operator shall conduct quarterly gas sampling of gas from vapor recovery system serving tanks S-3088-8 through '-16 and '-21 upstream of TVR compressor # 1(prior to connection to any other vapor control system). If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2201] Federally Enforceable Through Title V Permit

Facility Name: TRC CYPRESS GROUP LLC

Location: HEAVY OIL WESTERN STATIONARY SOURCE, CA

S-3088-11-4 : Oct 10 2022 7:46AM -- MUTHANAM

- 21. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. Permittee shall maintain records of the VOC content of vapor in the tank vapor control system, including date and test results. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit

S-3088-11-4: Oct 10 2022 7:46AM -- MUTHANAM

EXPIRATION DATE: 05/31/2022 **PERMIT UNIT:** S-3088-12-4

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

1000 BBL FIXED ROOF CRUDE OIL SHIPPING/REJECT TANK (T-1000-04) SERVED BY VAPOR CONTROL SYSTEM

LISTED ON S-3088-8

PERMIT UNIT REQUIREMENTS

- The tank shall be equipped with a vapor control system consisting of a closed system that collects VOCs from the storage tank and a VOC control device. The vapor control system shall be APCO-approved. Collected vapors shall be directed to approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in section 6.4 of District Rule 4623. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC's collected from tank shall vent only to vapor control system S-3088-8. [District Rule 2201] Federally Enforceable Through Title V Permit
- This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all 3. storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
- Maximum VOC content of vapor in the tank vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall conduct true vapor pressure (TVP) and API gravity testing of fluid stored by tanks S-3088-8 through '-16 and '-21 at least once every 24 months during summer (July- September), and/or whenever there is a change in the source or type of organic liquid stored in tanks S-3088-8 through '-16 and '-21 in order to maintain exemption form the rule. Sample for TVP analysis shall be taken from tank with highest storage temperature. [District Rule 4623] Federally Enforceable Through Title V Permit
- The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
- For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
- The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
- Permittee shall submit the records of TVP and API gravity testing to the Compliance Section of the Southern Region of the SJVAPCD within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit

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

Facility Name: TRC CYPRESS GROUP LLC

HEAVY OIL WESTERN STATIONARY SOURCE, CA Location:

S-3088-12-4 : Oct 10 2022 7:46AM -- MUTHANAM

- 10. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] Federally Enforceable Through Title V Permit
- 11. Operator shall conduct quarterly gas sampling of gas from vapor recovery system serving tanks S-3088-8 through '-16 and '-21 upstream of TVR compressor # 1(prior to connection to any other vapor control system). If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2201] Federally Enforceable Through Title V Permit

Facility Name: TRC CYPRESS GROUP LLC

Location: HEAVY OIL WESTERN STATIONARY SOURCE, CA

S-3088-12-4 : Oct 10 2022 7:46AM -- MUTHANAM

- 21. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. Permittee shall maintain records of the VOC content of vapor in the tank vapor control system, including date and test results. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit

EXPIRATION DATE: 05/31/2022 **PERMIT UNIT:** S-3088-13-4

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

1000 BBL FIXED ROOF CRUDE OIL SHIPPING/REJECT TANK (T-1000-05) SERVED BY VAPOR CONTROL LISTED

ON S-3088-8

PERMIT UNIT REQUIREMENTS

- The tank shall be equipped with a vapor control system consisting of a closed system that collects VOCs from the storage tank and a VOC control device. The vapor control system shall be APCO-approved. Collected vapors shall be directed to approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in section 6.4 of District Rule 4623. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC's collected from tank shall vent only to vapor control system S-3088-8. [District Rule 2201] Federally Enforceable Through Title V Permit
- This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all 3. storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
- Maximum VOC content of vapor in the tank vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall conduct true vapor pressure (TVP) and API gravity testing of fluid stored by tanks S-3088-8 through '-16 and '-21 at least once every 24 months during summer (July- September), and/or whenever there is a change in the source or type of organic liquid stored in tanks S-3088-8 through '-16 and '-21 in order to maintain exemption form the rule. Sample for TVP analysis shall be taken from tank with highest storage temperature. [District Rule 4623] Federally Enforceable Through Title V Permit
- The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
- For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
- The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
- Permittee shall submit the records of TVP and API gravity testing to the Compliance Section of the Southern Region of the SJVAPCD within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit

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

Facility Name: TRC CYPRESS GROUP LLC

HEAVY OIL WESTERN STATIONARY SOURCE, CA Location:

- 10. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] Federally Enforceable Through Title V Permit
- 11. Operator shall conduct quarterly gas sampling of gas from vapor recovery system serving tanks S-3088-8 through '-16 and '-21 upstream of TVR compressor # 1(prior to connection to any other vapor control system). If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2201] Federally Enforceable Through Title V Permit

Facility Name: TRC CYPRESS GROUP LLC

Location: HEAVY OIL WESTERN STATIONARY SOURCE, CA

S-3088-13-4 : Oct 10 2022 7:46AM -- MUTHANAM

- 21. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. Permittee shall maintain records of the VOC content of vapor in the tank vapor control system, including date and test results. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit

S-3088-13-4 : Oct 10 2022 7:46AM -- MUTHANAM

EXPIRATION DATE: 05/31/2022 **PERMIT UNIT:** S-3088-14-5

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

200 BBL FIXED ROOF CRUDE OIL SLOP TANK (T-3000-01) SERVED BY VAPOR CONTROL SYSTEM SHARED WITH

S-3088-8

PERMIT UNIT REQUIREMENTS

- The tank shall be equipped with a vapor control system consisting of a closed system that collects VOCs from the storage tank and a VOC control device. The vapor control system shall be APCO-approved. Collected vapors shall be directed to approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in section 6.4 of District Rule 4623. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC's collected from tank shall vent only to vapor control system S-3088-8. [District Rule 2201] Federally Enforceable Through Title V Permit
- This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all 3. storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
- Maximum VOC content of vapor in the tank vapor control system shall not exceed 10% by weight [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall conduct true vapor pressure (TVP) and API gravity testing of fluid stored by tanks S-3088-8 through '-16 and '-21 at least once every 24 months during summer (July- September), and/or whenever there is a change in the source or type of organic liquid stored in tanks S-3088-8 through '-16 and '-21 in order to maintain exemption form the rule. Sample for TVP analysis shall be taken from tank with highest storage temperature. [District Rule 4623] Federally Enforceable Through Title V Permit
- The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
- For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
- The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
- Permittee shall submit the records of TVP and API gravity testing to the Compliance Section of the Southern Region of the SJVAPCD within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit

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

Facility Name: TRC CYPRESS GROUP LLC

HEAVY OIL WESTERN STATIONARY SOURCE, CA Location:

S-3088-14-5 : Oct 10 2022 7:46AM -- MUTHANAM

- 10. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] Federally Enforceable Through Title V Permit
- 11. Operator shall conduct quarterly gas sampling of gas from vapor recovery system serving tanks S-3088-8 through '-16 and '-21 upstream of TVR compressor # 1(prior to connection to any other vapor control system). If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2201] Federally Enforceable Through Title V Permit

Facility Name: TRC CYPRESS GROUP LLC

Location: HEAVY OIL WESTERN STATIONARY SOURCE, CA

S-3088-14-5 : Oct 10 2022 7:46AM -- MUTHANAM

- 21. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. Permittee shall maintain records of the VOC content of vapor in the tank vapor control system, including date and test results. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit

S-3088-14-5 : Oct 10 2022 7:46AM -- MUTHANAM

EXPIRATION DATE: 05/31/2022 **PERMIT UNIT:** S-3088-15-5

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

250 BBL FIXED ROOF CRUDE OIL SLOP TANK (T-3000-02) SERVED BY VAPOR CONTROL SYSTEM SHARED WITH

S-3088-8

PERMIT UNIT REQUIREMENTS

- The tank shall be equipped with a vapor control system consisting of a closed system that collects VOCs from the storage tank and a VOC control device. The vapor control system shall be APCO-approved. Collected vapors shall be directed to approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in section 6.4 of District Rule 4623. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC's collected from tank shall vent only to vapor control system S-3088-8. [District Rule 2201] Federally Enforceable Through Title V Permit
- This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all 3. storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
- Maximum VOC content of vapor in the tank vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall conduct true vapor pressure (TVP) and API gravity testing of fluid stored by tanks S-3088-8 through '-16 and '-21 at least once every 24 months during summer (July- September), and/or whenever there is a change in the source or type of organic liquid stored in tanks S-3088-8 through '-16 and '-21 in order to maintain exemption form the rule. Sample for TVP analysis shall be taken from tank with highest storage temperature. [District Rule 4623] Federally Enforceable Through Title V Permit
- The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
- For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
- The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
- Permittee shall submit the records of TVP and API gravity testing to the Compliance Section of the Southern Region of the SJVAPCD within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit

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

Facility Name: TRC CYPRESS GROUP LLC

HEAVY OIL WESTERN STATIONARY SOURCE, CA Location:

- 10. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] Federally Enforceable Through Title V Permit
- 11. Operator shall conduct quarterly gas sampling of gas from vapor recovery system serving tanks S-3088-8 through '-16 and '-21 upstream of TVR compressor # 1(prior to connection to any other vapor control system). If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2201] Federally Enforceable Through Title V Permit

Facility Name: TRC CYPRESS GROUP LLC

Location: HEAVY OIL WESTERN STATIONARY SOURCE, CA

S-3088-15-5 : Oct 10 2022 7:46AM -- MUTHANAM

- 21. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. Permittee shall maintain records of the VOC content of vapor in the tank vapor control system, including date and test results. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit

S-3088-15-5 : Oct 10 2022 7:46AM -- MUTHANAM

EXPIRATION DATE: 05/31/2022 **PERMIT UNIT:** S-3088-16-5

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

1000 BBL FIXED ROOF CRUDE OIL SLOP TANK (T-3000-03) SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-3088-8

PERMIT UNIT REQUIREMENTS

- The tank shall be equipped with a vapor control system consisting of a closed system that collects VOCs from the storage tank and a VOC control device. The vapor control system shall be APCO-approved. Collected vapors shall be directed to approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in section 6.4 of District Rule 4623. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC's collected from tank shall vent only to vapor control system S-3088-8. [District Rule 2201] Federally Enforceable Through Title V Permit
- This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all 3. storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
- Maximum VOC content of vapor in the tank vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall conduct true vapor pressure (TVP) and API gravity testing of fluid stored by tanks S-3088-8 through '-16 and '-21 at least once every 24 months during summer (July- September), and/or whenever there is a change in the source or type of organic liquid stored in tanks S-3088-8 through '-16 and '-21 in order to maintain exemption form the rule. Sample for TVP analysis shall be taken from tank with highest storage temperature. [District Rule 4623] Federally Enforceable Through Title V Permit
- The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
- For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
- The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
- Permittee shall submit the records of TVP and API gravity testing to the Compliance Section of the Southern Region of the SJVAPCD within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit

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

Facility Name: TRC CYPRESS GROUP LLC

HEAVY OIL WESTERN STATIONARY SOURCE, CA Location:

S-3088-16-5 : Oct 10 2022 7:47AM -- MUTHANAM

- 10. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] Federally Enforceable Through Title V Permit
- 11. Operator shall conduct quarterly gas sampling of gas from vapor recovery system serving tanks S-3088-8 through '-16 and '-21 upstream of TVR compressor # 1(prior to connection to any other vapor control system). If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2201] Federally Enforceable Through Title V Permit

Facility Name: TRC CYPRESS GROUP LLC

Location: HEAVY OIL WESTERN STATIONARY SOURCE, CA

S-3088-16-5 : Oct 10 2022 7:47AM -- MUTHANAM

- 21. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. Permittee shall maintain records of the VOC content of vapor in the tank vapor control system, including date and test results. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit

EXPIRATION DATE: 05/31/2022 **PERMIT UNIT:** S-3088-20-8

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR C.E. NATCO NATURAL GAS/WASTE GAS-FIRED STEAM GENERATOR WITH A NORTH AMERICAN MODEL MAGNA-FLAME G-LE, ULTRA LOW NOX BURNER AND FLUE GAS RECIRCULATION - CYPRESS LEASE

PERMIT UNIT REQUIREMENTS

- All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- Combined SOx emissions from steam generators S-3088-7, '-20, and '-24 shall not exceed 328.5 lb/day. [District Rule 22011 Federally Enforceable Through Title V Permit
- Fuel gas sulfur content shall not exceed 1 gr S/100 scf unless SOx is reduced by 95% or to 9 ppmv SOx @ 3% O2 in exhaust with scrubber. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
- Emissions from the natural gas-fired unit shall not exceed any of the following limits: 14 ppmvd NOx @ 3% O2 or 0.017 lb-NOx/MMBtu, 0.0076 lb-PM10/MMBtu, 47.5 ppmvd CO @ 3% O2 or 0.035 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
- The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305 and 4306] 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.

Facility Name: TRC CYPRESS GROUP LLC

HEAVY OIL WESTERN STATIONARY SOURCE, CA Location:

- 10. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 11. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 12. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 13. Source testing to measure NOx and CO emissions from this unit while fired on natural gas shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 14. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 15. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 16. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 18. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 19. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 20. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
- 21. Permittee shall determine sulfur content of combusted gas weekly for eight consecutive weeks. After demonstrating compliance for eight consecutive weeks testing may be conducted on a quarterly basis. Weekly sulfur testing shall resume if quarterly testing does not indicate compliance. Weekly gas analysis shall be performed using Draeger tubes and quarterly analysis using ASTM method D3246 or double GC for H2S and mercaptans. First of the weekly gas analyses shall be done using laboratory analysis. [District Rules 1081, 2201, and 4320] Federally Enforceable Through Title V Permit

HEAVY OIL WESTERN STATIONARY SOURCE, CA Location:

- 22. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rules 1081, 2201, and 4320] Federally Enforceable Through Title V Permit
- 23. The following calculation shall be used to show compliance with the SOx daily emissions limit: lb SOx emitted/day = (volume of gas incinerated per day, in scf) x (ppm H2S prior to incineration) x 0.00000017. [District Rule 2201] Federally Enforceable Through Title V Permit
- 24. Records of weekly and quarterly test results for sulfur content, daily amounts of natural gas and waste gas combusted (in scf), higher heating values of natural gas and waste gas, and calculations to verify compliance with the sulfur SLC limit shared by units '-7, '-20, and '-24 shall be retained on-site for a period of at least five years and made readily available for District inspection upon request. [District Rules 1070, 2201, and 4320] Federally Enforceable Through Title V Permit
- 25. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit
- 26. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
- 27. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contacts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit
- 28. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit
- 29. Pursuant to Rule 4320, beginning January 1, 2025 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in the December 17, 2020 version of Rule 4320. [District Rule 4320]

EXPIRATION DATE: 05/31/2022 **PERMIT UNIT:** S-3088-21-4

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

1500 BBL CONSTANT LEVEL FIXED ROOF CRUDE OIL WASH TANK SERVED BY VAPOR CONTROL SYSTEM

SHARED WITH S-3088-8

PERMIT UNIT REQUIREMENTS

- The tank shall be equipped with a vapor control system consisting of a closed system that collects VOCs from the storage tank and a VOC control device. The vapor control system shall be APCO-approved. Collected vapors shall be directed to approved control devices having a destruction efficiency of at least 99% by weight as determined by the test method specified in section 6.4 of District Rule 4623. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC's collected from tank shall vent only to vapor control system S-3088-8. [District Rule 2201] Federally Enforceable Through Title V Permit
- This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all 3. storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
- Maximum VOC content of vapor in the tank vapor control system shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall conduct true vapor pressure (TVP) and API gravity testing of fluid stored by tanks S-3088-8 through '-16 and '-21 at least once every 24 months during summer (July- September), and/or whenever there is a change in the source or type of organic liquid stored in tanks S-3088-8 through '-16 and '-21 in order to maintain exemption form the rule. Sample for TVP analysis shall be taken from tank with highest storage temperature. [District Rule 4623] Federally Enforceable Through Title V Permit
- The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623] Federally Enforceable Through Title V Permit
- For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623] Federally Enforceable Through Title V Permit
- The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623] Federally Enforceable Through Title V Permit
- Permittee shall submit the records of TVP and API gravity testing to the Compliance Section of the Southern Region of the SJVAPCD within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit

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

Facility Name: TRC CYPRESS GROUP LLC

HEAVY OIL WESTERN STATIONARY SOURCE, CA Location:

S-3088-21-4 : Oct 10 2022 7:47AM -- MUTHANAM

- 10. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] Federally Enforceable Through Title V Permit
- 11. Operator shall conduct quarterly gas sampling of gas from vapor recovery system serving tanks S-3088-8 through '-16 and '-21 upstream of TVR compressor # 1(prior to connection to any other vapor control system). If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. During a District inspection, any tank, gauge hatch, sampling device, or other component that is not leak free will not be a violation of this permit provided the facility records, tags, and repairs the leak in accordance with the requirements of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. All piping, fittings, and valves shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of this permit. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2201] Federally Enforceable Through Title V Permit

Facility Name: TRC CYPRESS GROUP LLC

Location: HEAVY OIL WESTERN STATIONARY SOURCE, CA

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- 21. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. Permittee shall maintain records of the VOC content of vapor in the tank vapor control system, including date and test results. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit

EXPIRATION DATE: 05/31/2022 **PERMIT UNIT:** S-3088-24-6

SECTION: SW22 TOWNSHIP: 32S RANGE: 23E

EQUIPMENT DESCRIPTION:

62.5 MMBTU/HR C.E. NATCO NATURAL GAS/WASTE GAS FIRED STEAM GENERATOR (#92 DIS# 27572-80) WITH NORTH AMERICAN MAGNA FLAME GLE ULTRA LOW NOX BURNER

PERMIT UNIT REQUIREMENTS

- All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] 2.
- 3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- Combined SOx emissions from steam generators S-3088-7, '-20, and '-24 shall not exceed 328.5 lb/day. [District Rule 22011 Federally Enforceable Through Title V Permit
- Fuel gas sulfur content shall not exceed 1 gr S/100 scf unless SOx is reduced by 95% or to 9 ppmv SOx @ 3% O2 in exhaust with scrubber. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
- Emission rates from the unit shall not exceed any of the following limits: 0.058 lb-PM10/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
- Except during startup and shutdown, emission rates from the unit shall not exceed any of the following limits: 14 ppmv NOx @ 3% O2. or 47 ppmv CO @ 3% O2. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
- Emission rates during startup and shutdown shall not exceed: NO2 140 pounds per hour or 0.14 pounds per MMBtu. [District Rules 4301 and 4405] Federally Enforceable Through Title V Permit
- 10. Emission rates shall not exceed any of the following: NOx (as NO2): 54.0 lb/day or 9855 lb/year, CO: 52.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 11. Start-up is defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. Shutdown is defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 12. Duration of start-up or shutdown shall not exceed two hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. The operator shall maintain daily records of the duration of start-up and shutdown periods. [District Rules 4305 and 4306] 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.

Facility Name: TRC CYPRESS GROUP LLC

HEAVY OIL WESTERN STATIONARY SOURCE, CA Location:

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- 13. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 14. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 15. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 16. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 17. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 18. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 19. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 20. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
- 22. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 23. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 24. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

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- 25. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
- 26. Permittee shall determine sulfur content of combusted gas weekly for eight consecutive weeks. After demonstrating compliance for eight consecutive weeks testing may be conducted on a quarterly basis. Weekly sulfur testing shall resume if quarterly testing does not indicate compliance. Weekly gas analysis shall be performed using Draeger tubes and quarterly analysis using ASTM method D3246 or double GC for H2S and mercaptans. First of the weekly gas analyses shall be done using laboratory analysis. [District Rules 1081, 2201, and 4320] Federally Enforceable Through Title V Permit
- 27. Compliance with fuel sulfur limit(s) can be demonstrated either by monitoring sulfur content at location(s) after all fuel sources are combined prior to incineration, or by monitoring the sulfur content and volume of each fuel source and performing mass balance calculations. Records of monitoring locations, detected sulfur concentrations, and mass balance calculations, if necessary, shall be maintained and kept onsite and made readily available for District inspection upon request. [District Rules 1081, 2201, and 4320] Federally Enforceable Through Title V Permit
- 28. The following calculation shall be used to show compliance with the SOx daily emissions limit: 1b SOx emitted/day = (volume of gas incinerated per day, in scf) x (ppm H2S prior to incineration) x 0.00000017. [District Rule 2201] Federally Enforceable Through Title V Permit
- 29. Records of weekly and quarterly test results for sulfur content, daily amounts of natural gas and waste gas combusted (in scf), higher heating values of natural gas and waste gas, and calculations to verify compliance with the sulfur SLC limit shared by units '-7, '-20, and '-24 shall be retained on-site for a period of at least five years and made readily available for District inspection upon request. [District Rules 1070, 2201, and 4320] Federally Enforceable Through Title V Permit
- 30. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit
- 31. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
- 32. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contacts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320] Federally Enforceable Through Title V Permit
- 33. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit
- 34. Pursuant to Rule 4320, beginning January 1, 2025 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in the December 17, 2020 version of Rule 4320. [District Rule 4320]

ATTACHMENT C

Detailed Summary List of Facility Permits

TRC CYPRESS GROUP LLC

FAC#

Detailed Facility ReportFor Facility=3088 and excluding Deleted Permits Sorted by Facility Name and Permit Number

S 3088

TYPE:

TitleV

10/20/22 2:22 pm

05/31/2022

EXPIRE ON:

HEAVY OIL WESTERN STATIONARY SOURCE CA			STATUS: TELEPHONE:		A 6617630081		TOXIC ID: 60294 AREA: 7 / INSP. DATE: 08/23
PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
S-3088-7-10	62.5 MMBtu/hr	3020-02 H	1	1,238.00	1,238.00	Α	62.5 MMBTU/HR NATURAL GAS/WASTE GAS FIRED STEAM GENERATOR WITH NORTH AMERICAN MAGNA-FLAME G-LE ULTRA LOW NOX BURNER AND FLUE GAS RECIRCULATION (CYPRESS LEASE)
S-3088-8-16	150 wells	3020-09S A	150	5.62	843.00	Α	THERMALLY ENHANCED OIL RECOVERY OPERATION WITH 150 STEAM ENHANCED CRUDE OIL PRODUCTION WELLS AND 665 SCFM AIR ASSIST STANDBY FLARE, WITH VAPOR PIPING FROM TANKS S-3088-9 THROUGH -16, -21 AND -22, GAS/LIQUID SEPARATORS, COMPRESSORS, HEAT EXCHANGERS, CONDENSATE PUMPS, FOUR SULFATREAT HP PACKED VESSELS, AND INCINERATION IN STEAM GENERATORS S-3088-7, '-20, OR '-24, OR STANDBY FLARE
S-3088-9-4	1500 bbl	3020-05S D	1	91.00	91.00	Α	1500 BBL FIXED ROOF CONSTANT LEVEL CRUDE OIL WASH TANK (1000-01) SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-3088-8
S-3088-10-4	1000 bbl	3020-05S C	1	78.00	78.00	Α	1000 BBL FIXED ROOF CRUDE OIL SHIPPING/REJECT TANK (T-1000-2) SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-3088-8
S-3088-11-4	42,000 Gal Oil Tank - Small Producer	3020-05S C	1	78.00	78.00	Α	1000 BBL FIXED ROOF CRUDE OIL SHIPPING/REJECT TANK (T-1000-03) SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-3088-8
S-3088-12-4	1000 bЫ	3020-05S C	1	78.00	78.00	Α	1000 BBL FIXED ROOF CRUDE OIL SHIPPING/REJECT TANK (T-1000-04) SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-3088-8
S-3088-13-4	1000 bbl	3020-05S C	1	78.00	78.00	Α	1000 BBL FIXED ROOF CRUDE OIL SHIPPING/REJECT TANK (T-1000-05) SERVED BY VAPOR CONTROL LISTED ON S-3088-8
S-3088-14-5	8400 gallons	3020-05\$ B	1	56.00	56.00	Α	200 BBL FIXED ROOF CRUDE OIL SLOP TANK (T-3000-01) SERVED BY VAPOR CONTROL SYSTEM SHARED WITH S-3088-8
S-3088-15-5	10,500 gallons	3020-05S B	1	56.00	56.00	Α	250 BBL FIXED ROOF CRUDE OIL SLOP TANK (T-3000-02) SERVED BY VAPOR CONTROL SYSTEM SHARED WITH S-3088-8
S-3088-16-5	42,000 gallon	3020-05S C	1	78.00	78.00	Α	1000 BBL FIXED ROOF CRUDE OIL SLOP TANK (T-3000-03) SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-3088-8
S-3088-20-8	62.5 MMBtu/hr	3020-02 H	1	1,238.00	1,238.00	Α	62.5 MMBTU/HR C.E. NATCO NATURAL GAS/WASTE GAS-FIRED STEAM GENERATOR WITH A NORTH AMERICAN MODEL MAGNA- FLAME G-LE, ULTRA LOW NOX BURNER AND FLUE GAS RECIRCULATION - CYPRESS LEASE
S-3088-21-4	63,000 gallons	3020-05S D	1	91.00	91.00	Α	1500 BBL CONSTANT LEVEL FIXED ROOF CRUDE OIL WASH TANK SERVED BY VAPOR CONTROL SYSTEM SHARED WITH S-3088-8
S-3088-24-6	62.5 MMBtu/hr	3020-02 H	1	1,238.00	1,238.00	Α	62.5 MMBTU/HR C.E. NATCO NATURAL GAS/WASTE GAS FIRED STEAM GENERATOR (#92 DIS# 27572-80) WITH NORTH AMERICAN MAGNA FLAME GLE ULTRA LOW NOX BURNER

Number of Facilities Reported: 1