SEP 28 2012

William J. Hill
Occidental of Elk Hills, Inc.
10800 Stockdale Highway
Bakersfield, CA 93311

Re: Notice of Preliminary Decision - Federally Mandated Operating Permit
District Facility # S-6848
Project # 1112522

Dear Mr. Hill:

Enclosed for your review and comment is the District's analysis of Occidental of Elk
Hills, Inc. application for the Federally Mandated Operating Permit for its crude oil
production operation in their Western Kern County Fields Heavy Oil stationary source,
California.

The notice of preliminary decision for this project will be published approximately three
days from the date of this letter. Please submit your written comments on this project
within the 30-day comment period which begins on the date of publication of the public
notice.

Thank you for your cooperation in this matter. If you have any questions regarding this
matter, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-
5500.

Sincerely,

David Warner
Director of Permit Services

cc: David Torii, Permit Services Engineer

Attachments
SEP 28 2012

Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

Re:  Notice of Preliminary Decision - Federally Mandated Operating Permit
    District Facility # S-6848
    Project # 1112522

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of Occidental of Elk Hills, Inc. application for the Federally Mandated Operating Permit for its crude oil production operation in their Western Kern County Fields Heavy Oil stationary source, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 45-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,

David Warner
Director of Permit Services

cc: David Torii, Permit Services Engineer

Attachments
SEP 28 2012

Mike Tollstrup, Chief
Project Assessment Branch
Air Resources Board
P O Box 2815
Sacramento, CA 95812-2815

Re: Notice of Preliminary Decision - Federally Mandated Operating Permit
District Facility # S-6848
Project # 1112522

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of Occidental of Elk Hills, Inc. application for the Federally Mandated Operating Permit for its crude oil production operation in their Western Kern County Fields Heavy Oil stationary source, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,

David Warner
Director of Permit Services

cc: David Torii, Permit Services Engineer

Attachments
NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED ISSUANCE OF
FEDERALLY MANDATED OPERATING PERMITS

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed issuance of the Federally Mandated Operating permits to Occidental of Elk Hills, Inc. for its crude oil production operation in their Western Kern County Fields Heavy Oil stationary source, California.

The District's analysis of the legal and factual basis for this proposed action, project #1112522, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. There are no emission changes associated with this proposed action. This will be the public's only opportunity to comment on the specific conditions of the proposed Federally Mandated Operating initial permits. If requested by the public, the District will hold a public hearing regarding issuance of this initial permit. For additional information, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500. Written comments on the proposed initial permit must be submitted within 30 days of the publication date of this notice to DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308.
## TABLE OF CONTENTS

I. PROPOSAL .................................................................................................................. 1

II. FACILITY LOCATION ............................................................................................. 1

III. EQUIPMENT LISTING ......................................................................................... 1

IV. GENERAL PERMIT TEMPLATE USAGE ............................................................. 2

V. SCOPE OF EPA AND PUBLIC REVIEW ................................................................. 2

VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES ......................................................................................... 2

VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES ................................................................. 2

VIII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE .......................................... 4

IX. COMPLIANCE ........................................................................................................ 4

X. PERMIT SHIELD .................................................................................................... 15

XI. PERMIT CONDITIONS ......................................................................................... 15

ATTACHMENT A (EQUIPMENT LISTING) ................................................................. A-1

ATTACHMENT B (EXEMPT EQUIPMENT LISTING AND ACTIVITIES LISTING) ................................................................. B-1

ATTACHMENT C (CURRENT DISTRICT PTOS & ATCS) ............................................. C-1

ATTACHMENT D (CURRENT DISTRICT RULE SIP COMPARISON) .......................... D-1

ATTACHMENT E (FACILITY COMMENTS / DISTRICT RESPONSES) ......................... E-1
IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is not requesting to use the any model general permit templates:

V. SCOPE OF EPA AND PUBLIC REVIEW

Since applicant is not requested to use any model general permit templates, the proposed permit in its entirety is subject to EPA and public review.

VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES

The applicant has not proposed to utilize any model general permit templates. All applicable requirements are explicitly addressed in the permit outside of the general permit templates.

VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES

District New and Modified Stationary Source Review Rule

District Rule 1070, Inspections (as amended December 17, 1992)

District Rule 1081, Source Sampling (as amended December 16, 1993)

District Rule 1100, Equipment Breakdown (as amended December 17, 1992)

District Rule 2010, Permits Required (as amended December 17, 1992)

District Rule 2020, Exemptions (as amended December 20, 2007)

District Rule 2031, Transfer Of Permits (as amended December 17, 1992)

District Rule 2040, Applications (as amended December 17, 1992)

District Rule 2070, Standards for Granting Applications (as amended December 17, 1992)

District Rule 2080, Conditional Approval (as amended December 17, 1992)

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

District Rule 4101, Visible Emissions (as amended December 17, 2005)
VIII. 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 Permit. The terms and conditions that are part of the facility's Title V permit are designated as "Federally Enforceable Through the Title V Permit".

The facility is subject to the following District rules which are not currently Federally Enforceable:

1. District Rule 4102 - Nuisance

For this facility, condition 2 of the facility wide requirements are based on the rules identified above and are not Federally Enforceable Through the Title V Permit.

IX. COMPLIANCE

A. Requirements Addressed by Model General Permit Templates

The applicant has chosen to not use any general permit templates; therefore, no requirements are addressed by model general permit templates.

B. Requirements Not Addressed by Model General Permit Templates

The applicant has not proposed to utilize any model general permit templates. All applicable requirements are explicitly addressed in the permit outside of the general permit templates.

1. New and Modified Stationary Source Review Rule (District NSR Rule)

   a. Free water knock out vessel (S-6848-7-0)

Permit unit S-6948-7 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct.

- Condition 1 from the PTO was not necessary and was deleted. This condition lists the previous owners permit number which is listed in the PAS system; therefore, the condition is not needed.
- Condition 2 from the PTO was included as condition 2 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
• Condition 1 from the PTO was not necessary and was deleted. This condition lists the previous owners permit number which is listed in the PAS system; therefore, the condition is not needed.
• Condition 2 from the PTO was included as condition 2 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
• Conditions 5, 9, 10, 13 and 16 from the PTO pertain to 0.5 psia TVP Rule 4623 exemption requirements. Since the tank has vapor control and is in compliance with 4623 there is no benefit to being exempt. These conditions have been deleted as requested by the applicant.
• Conditions 3, 4, 6 through 8, 11 through 15 and 17 from the PTO were included as conditions 1 through 10, respectively, of the requirements for this permit unit.

d. Heater Treater Vessel (S-6848-10-0)

Permit unit S-6948-10 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct

• Condition 1 from the PTO was not necessary and was deleted. This condition lists the previous owners permit number which is listed in the PAS system; therefore, the condition is not needed.
• Condition 2 from the PTO was included as condition 2 of the facility wide requirements. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
• Conditions 5, 12, 13, 16 and 18 from the PTO pertain to 0.5 psia TVP Rule 4623 exemption requirements. Since the tank has vapor control and is in compliance with 4623 there is no benefit to being exempt. These conditions have been deleted as requested by the applicant.
• Conditions 10, 11 and 20 from the PTO pertain to the heater treater. The heater treater was issued its own PEER. Therefore, these conditions have been deleted. Reference to the heater treater was removed from the Equipment Description also.
• Conditions 3, 4, 7, 8, 9, 13, 14, 15, 17, 19, 20 and 21 from the PTO were included as conditions 1 through 10, respectively, of the requirements for this permit unit.

e. Storage Tank (S-6848-11-0)

Permit unit S-6948-9 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct

• Condition 1 from the PTO was included as condition 2 of the facility wide requirements. This condition is not federally enforceable because
OEHI
Facility #: S-6848
Project #: 1112522

Table 1 - Comparison of District Rule 1100 to Kern County Rule 111

<table>
<thead>
<tr>
<th>REQUIREMENT</th>
<th>District Rule 1100</th>
<th>Kern County Rule 111</th>
</tr>
</thead>
<tbody>
<tr>
<td>A breakdown occurrence must be reported as soon as reasonably possible but no later than 1 hour after detection.</td>
<td>✓</td>
<td>✓ (2 hours)</td>
</tr>
<tr>
<td>A variance must be obtained if the occurrence will last longer than a production run or 24 hours, whichever is shorter (96 hours for CEM systems)</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>A report must be submitted to the APCO within 10 days of correction of a breakdown occurrence which includes the following:</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>1) A statement that the breakdown condition has been corrected together with the date of correction and proof of compliance.</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>2) A specific statement of the reason(s) or cause(s) for the occurrence sufficient to enable the APCO to determine whether the occurrence was a breakdown condition.</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>3) A description of corrective measures undertaken and/or be undertaken to avoid such an occurrence in the future.</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>4) Pictures of the equipment or controls which, failed if available.</td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>

3. **District Rule 1130 Severability** (as amended December 17, 1992)

   a. Facility Wide (S-6848-0-1)

   Section 2.0 requires that if any provision, clause, sentence, paragraph, section or part of these conditions for any reason be judged invalid, such judgment shall not affect or invalidate the remainder of conditions. Condition 14 of facility wide requirements (S-6848-0-1) assures compliance with this requirement.

4. **District Rule 1160 Emission Standards** (adapted November 18, 1992)

   a. Facility-wide (S-6848-0-1)

   Section 5.0 requires the owner or operator of any stationary source to provide the District with a written emission statement showing actual emissions of reactive organic gases (ROGs) and nitrogen oxides (NOx) from that source. The District waives this requirement for sources emitting less than 25 tons per year of these pollutants if the District provides the Air Resources Board (ARB) with an emission inventory of sources emitting greater than 10 tons per year of NOx or ROGs based on the use of emission factors acceptable to the ARB. See condition 5 of the facility-wide requirements (S-6848-0-1).

5. **District Rule 2020 Exemptions** (as amended March 21, 2002) - (Non SIP replacement for Kern County Rule 202)

   a. Facility Wide (S-6848-0-1)
8.  District Rule 2520  Federally Mandated Operating Permits  (as amended June 21, 2001)

a.  Facility Wide (S-6848-0-1)

Section 5.2 requires that permittees submit applications for Title V permit renewal at least six months prior to permit expiration. Condition 39 of the facility wide requirements (S-6848-0-1) assures compliance with this requirement.

Sections 9.4.1 and 9.4.2 contain requirements to incorporate all applicable record keeping requirements into the Title V permit, specific records of any required monitoring, and the retention of all required monitoring data and support information for five years. The requirements to keep specific monitoring records and retain records for five years are stated in condition 10 and 11 of the facility wide requirements (S-6848-0-1).

Section 9.5 contains requirements for the submittal of reports for monitoring results at least every six months and prompt recording of deviations from permitting requirements, including those attributable to upset conditions. All required reports must be certified by the responsible official. These requirements are stated in conditions 12 and 13 of the facility wide requirements (S-6848-0-1).

Section 9.7 states that the Title V permit also must contain a severability clause in case of a court challenge; the severability clause is in condition 14 of the facility wide requirements (S-6848-0-1).

Section 9.8 contains following provisions for the Title V permit: 1) the permittee must comply with all permit conditions; 2) that the permitted activity would have to be reduced to comply with the permit conditions should not be a defense in an enforcement action, 3) that the permit may be revoked, modified, reissued, or reopened for cause, 4) that the Title V permit does not reflect any property rights, and 5) that the permittee will furnish the District with any requested information to determine compliance. Compliance with this section will be assured by conditions 7 and 15 through 18 of the facility wide requirements S-6848-0-1.

Section 9.9 requires the permittee to pay annual permit fees and applicable fees described in District Rules 3010, 3030, 3050, 3080, 3090, 3110, and 3120. This requirement is stated in condition 19 of the facility wide requirements (S-6848-0-1).

Section 9.12.1 states that all terms and conditions of a permit are required pursuant to the CAA, including provisions designed to limit potential to
10. District Rule 4601 **Architectural Coatings** (as amended December 17, 2009)

a. Facility Wide (S-6848-0-1)

The latest version of District Rule 4601 has not been SIP approved. Attachment D contains the streamlining of the SIP approved District Rule 4601 (10/31/01) to the current District Rule 4601 to show the current rule is as stringent if not more than the SIP approved version. Conditions 25 through 27 on the facility-wide permit (S-6848-0-1) demonstrate compliance with the requirements of the latest version of this rule.

11. District Rule 4623 **Storage of Organic Liquids** (as amended May 19, 2005)

The purpose of this rule is to limit volatile organic compound (VOC) emissions from the storage of organic liquids. This rule applies to any tank with a capacity of 1,100 gallons or greater in which any organic liquid is placed, held, or stored.

This rule limits volatile organic compound (VOC) emissions from the storage of organic liquids. It applies to any tank with a capacity of 1,100 gallons or greater in which any organic liquid is placed, held, or stored. The rule was amended in May 19, 2005.

Section 4.3 states that except for complying with Sections 6.3.4 and 7.2, a small producer's tank with a throughput of 50 barrels of crude oil per day or less is exempt from the requirements of this rule. All other small producer tanks that do not qualify for exemption under Section 4.4 shall comply with all the requirements of this rule.

Section 4.4 states that tanks exclusively receiving and/or storing an organic liquid with a TVP less than 0.5 psia are exempt from all other requirements of the rule except for complying with the following provisions:

4.4.1 TVP and API Gravity Testing provisions pursuant to Section 6.2,
4.4.2 Recordkeeping provisions pursuant to Section 6.3.6,
4.4.3 Test Methods provisions pursuant to Section 6.4, and
4.4.4 Compliance schedules pursuant to Section 7.2.

The requirements of Section 4.4 shall not apply to tanks that are exempt pursuant to Sections 4.1 through 4.3.

Section 5.1 requires that no organic liquid shall be placed, held, or stored in any tank unless the tank is equipped with a VOC control system identified in Table 1.
Crude Oil Storage Tank (S-6848-11-1)

Conditions 1 through 5 and 7 through 10 of the requirements for this permit unit assures compliance with this rule.

12. **District Rules 8021, 8031, 8041, 8051, 8061, and 8071 Fugitive Dust (PM_{10}) Emissions** (as amended September 17, 2004)

   a. Facility Wide (S-6848-0-1)

   These rules contain requirements for the control of fugitive dust. These requirements apply to a variety of sources, including: construction, demolition, excavation, extraction, and water mining activities; outdoor storage piles; paved and unpaved roads. Conditions 31 thorough 36 of the facility wide requirements (S-6848-0-1) assure compliance with these rules.

13. **40 CFR 82 Subpart B & F - Stratospheric Ozone**

   a. Facility Wide (S-6848-0-1)

   These are applicable requirements from Title Vi of the CAA (Stratospheric Ozone) which apply to all sources. The requirements pertain to air conditioners, chillers, and refrigerators located at a Title V source and to disposal of air conditioners or maintenance/recharging/disposal of motor vehicle air conditioners. Conditions 29 & 30 of the facility wide requirements (S-6848-0-1) address these requirements.

14. **40 CFR 61, Subpart M - Asbestos**

   a. Facility Wide (S-6848-0-1)

   These are applicable requirements from the National Emissions Standards for Hazardous Air Pollutants, which apply to all sources. The requirements pertain to asbestos removal and disposal from renovated or demolished structures. Compliance with these requirements is assured by condition 37 of the facility wide requirements (S-6848-0-1).

15. **CFR Part 64 Compliance Assurance Monitoring**

   a. 40 CFR Part 64 requires Compliance Assurance Monitoring (CAM) for units that meet all three following criteria:

      1) the unit must have an emission limit for the pollutant;

      ...
FACILITY-WIDE REQUIREMENTS

1. Facilities S-6848 and S-1327 constitute one stationary source. [District Rule 2201] Federally Enforceable Through Title V Permit

2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

3. 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

4. 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

5. 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

6. 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

7. 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

8. 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

9. 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]

10. 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 Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: OCCIDENTAL OF ELK HILLS INC
Location: HEAVY OIL WESTERN

502-400-1: 5:30 2012 10:08AM - 10PRD
24. 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

25. 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

26. 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

27. 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

28. 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

29. 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

30. 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

31. 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

32. 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

33. 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

34. 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

35. 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
PERMIT UNIT REQUIREMENTS

1. FWKO vapors shall be vented only to vapor control system described on tank permit S-6848-8. [District Rule 4623] Federally Enforceable Through Title V Permit

2. VOC emission rate from components in gas and light crude oil service associated with this emissions unit shall be less than 0.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

3. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit

4. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit. A liquid leak is defined as an organic liquid drip rate of more than three drops per minute and such a rate is a violation of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit

6. Tank roof, tank shell, tank vapor space appurtenances, vapor control system piping, and vapor control system components shall be inspected and monitored using EPA Method 21 at least monthly. Items found to be not leaking may then be inspected and monitored at least once every 3 months until a leak is detected at which time the inspection and monitoring frequency shall revert to monthly until such time that two consecutive monthly inspections reveal with no leaks at which time the inspection and monitoring frequency shall revert to at least once every 3 months. [District Rule 4623] Federally Enforceable Through Title V Permit

7. A visible mist, liquid dripping at the rate of more than 3 drops per minute, and vapor leaks of 50,000 ppm or greater VOC as methane shall be repaired as expeditiously as possible but in no case beyond 24 hours of detecting the leak and shall be re-monitored using EPA Method 21 upon completion of the repair. Vapor leaks equal to or greater than 10,000 ppm and less than 50,000 ppm VOC as methane shall be repaired within 5 days of detecting the leak and re-monitored using EPA Method 21 upon completion of the repair. Vapor leaks equal to or greater than 1,000 ppm and less than 10,000 ppm VOC as methane shall be repaired within 14 days of leak detection and shall be re-monitored using EPA Method 21 upon completion of the repair. [District Rule 4623] Federally Enforceable Through Title V Permit

8. Upon detection of a leak, permittee shall tag the leak with a uniquely numbered tag, and shall record the leak location, component leaking, identification tag number, leak magnitude, date of leak detection, date of repair, method of repair, and post-repair monitoring measurement. Such records of leaks shall be maintained current and shall be made readily available for District inspection upon request. [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.
PERMIT UNIT REQUIREMENTS

1. VOC emissions from components associated with this emission unit in gas and light crude oil service shall be less than 0.5 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit

2. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in gas-tight condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.7. [District Rule 4623] Federally Enforceable Through Title V Permit

3. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit

4. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit. A liquid leak is defined as an organic liquid drip rate of more than three drops per minute and such a rate is a violation of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit

6. Tank roof, tank shell, tank vapor space appurtenances, vapor control system piping, and vapor control system components shall be inspected and monitored using EPA Method 21 at least monthly. Items found to be not leaking may then be inspected and monitored at least once every 3 months until a leak is detected at which time the inspection and monitoring frequency shall revert to monthly until such time that two consecutive monthly inspections reveal with no leaks at which time the inspection and monitoring frequency shall revert to at least once every 3 months. [District Rule 4623] Federally Enforceable Through Title V Permit

7. Upon detection of a leak, permittee shall tag the leak with a uniquely numbered tag, and shall record the leak location, component leaking, identification tag number, leak magnitude, date of leak detection, date of repair, method of repair, and post-repair monitoring measurement. Such records of leaks shall be maintained current and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-6848-9-1
SECTION: SE35  TOWNSHIP: 30S  RANGE: 22E
EXPIRATION DATE: 08/31/2015

EQUIPMENT DESCRIPTION:
1,000 BBL FIXED ROOF CRUDE OIL SHIPPING TANK SERVED BY VAPOR CONTROL SYSTEM LISTED ON PERMIT UNIT S-6848-8 (ASPHALTO FIELD)

PERMIT UNIT REQUIREMENTS

1. Tank vapors shall be vented only to vapor control system described on tank permit S-6848-8. [District Rule 4623] Federally Enforceable Through Title V Permit

2. VOC emission rate from components in gas and light crude oil service associated with this emissions unit shall be less than 0.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

3. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit

4. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit. A liquid leak is defined as an organic liquid drip rate of more than three drops per minute and such a rate is a violation of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit

6. Tank roof, tank shell, tank vapor space appurtenances, vapor control system piping, and vapor control system components shall be inspected and monitored using EPA Method 21 at least monthly. Items found to be not leaking may then be inspected and monitored at least once every 3 months until a leak is detected at which time the inspection and monitoring frequency shall revert to monthly until such time that two consecutive monthly inspections reveal with no leaks at which time the inspection and monitoring frequency shall revert to at least once every 3 months. [District Rule 4623] Federally Enforceable Through Title V Permit

7. Upon detection of a leak, permittee shall tag the leak with a uniquely numbered tag, and shall record the leak location, component leaking, identification tag number, leak magnitude, date of leak detection, date of repair, method of repair, and post-repair monitoring measurement. Such records of leaks shall be maintained current and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit


9. The permittee shall keep accurate records of the dates of inspection and monitoring and the components inspected and monitored. [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.
PERMIT UNIT REQUIREMENTS

1. Tank vapors shall be vented only to vapor control system described on tank permit S-6848-8. [District Rule 4623] Federally Enforceable Through Title V Permit

2. VOC emission rate from components in gas and light crude oil service associated with this emissions unit shall be less than 0.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

3. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit

4. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit. A liquid leak is defined as an organic liquid drip rate of more than three drops per minute and such a rate is a violation of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit

6. Tank roof, tank shell, tank vapor space appurtenances, vapor control system piping, and vapor control system components shall be inspected and monitored using EPA Method 21 at least monthly. Items found to be not leaking may then be inspected and monitored at least once every 3 months until a leak is detected at which time the inspection and monitoring frequency shall revert to monthly until such time that two consecutive monthly inspections reveal with no leaks at which time the inspection and monitoring frequency shall revert to at least once every 3 months. [District Rule 4623] Federally Enforceable Through Title V Permit

7. Upon detection of a leak, permittee shall tag the leak with a uniquely numbered tag, and shall record the leak location, component leaking, identification tag number, leak magnitude, date of leak detection, date of repair, method of repair, and post-repair monitoring measurement. Such records of leaks shall be maintained current and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit


9. The permittee shall keep accurate records of the dates of inspection and monitoring and the components inspected and monitored. [District Rule 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-6848-11-1
EXPIRATION DATE: 09/30/2015

EQUIPMENT DESCRIPTION:
1,000 BBL PRODUCED WATER TANK TIED TO A VAPOUR CONTROL SYSTEM LISTED ON THE TANK PERMIT S-6848-8

PERMIT UNIT REQUIREMENTS

1. Tank vapors shall be vented only to the vapor control system. [District Rule 4623] Federally Enforceable Through Title V Permit

2. VOC emissions from components associated with this emission unit in gas and light crude oil service shall be less than 0.5 pounds per day. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit

3. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit

4. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit. A liquid leak is defined as an organic liquid drip rate of more than three drops per minute and such a rate is a violation of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit


7. Tank roof, tank shell, tank vapor space appurtenances, vapor control system piping, and vapor control system components shall be inspected and monitored using EPA Method 21 at least monthly. Items found to be not leaking may then be inspected and monitored at least once every 3 months until a leak is detected at which time the inspection and monitoring frequency shall revert to monthly until such time that two consecutive monthly inspections reveal with no leaks at which time the inspection and monitoring frequency shall revert to at least once every 3 months. [District Rule 4623] Federally Enforceable Through Title V Permit

8. Upon detection of a leak, permittee shall tag the leak with a uniquely numbered tag, and shall record the leak location, component leaking, identification tag number, leak magnitude, date of leak detection, date of repair, method of repair, and post-repair monitoring measurement. Such records of leaks shall be maintained current and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit

9. The permittee shall keep records of the dates of inspection and monitoring and the components inspected and monitored. [District Rule 4623] Federally Enforceable Through Title V Permit

10. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit

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

Equipment Listing
### Detailed Facility Report

**For Facility=6848 and excluding Deleted Permits**

**Sorted by Facility Name and Permit Number**

<table>
<thead>
<tr>
<th>PERMIT NUMBER</th>
<th>FEE DESCRIPTION</th>
<th>FEE RULE</th>
<th>QTY</th>
<th>FEE AMOUNT</th>
<th>FEE TOTAL</th>
<th>PERMIT STATUS</th>
<th>EQUIPMENT DESCRIPTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>S-6848-7-0</td>
<td>11,256 gallons</td>
<td>3020-05 B</td>
<td>1</td>
<td>93.00</td>
<td>93.00</td>
<td>A</td>
<td>268 BBL FREE WATER KNOCK OUT (FWKO) VESSEL SERVED BY VAPOR CONTROL SYSTEM LISTED ON PERMIT UNIT S-6848-8 (ASPHALTO FIELD)</td>
</tr>
<tr>
<td>S-6848-8-1</td>
<td>42,000 gal</td>
<td>3020-05 C</td>
<td>1</td>
<td>135.00</td>
<td>135.00</td>
<td>A</td>
<td>1,000 BBL FIXED ROOF CRUDE OIL WASH TANK WITH TANK VAPOR CONTROL SYSTEM SHARED WITH PERMITS S-6848-7, 8-9, AND 8-10 AND 8-11; INCLUDING COMPRESSOR(S), VAPOR PIPING, AND SULFA TREAT SULFUR SCRUBBER (ASPHALTO FIELD)</td>
</tr>
<tr>
<td>S-6848-9-0</td>
<td>42,000 gallons</td>
<td>3020-05 C</td>
<td>1</td>
<td>135.00</td>
<td>135.00</td>
<td>A</td>
<td>1,000 BBL FIXED ROOF CRUDE OIL SHIPPING TANK SERVED BY VAPOR CONTROL SYSTEM LISTED ON PERMIT UNIT S-6848-8 (ASPHALTO FIELD)</td>
</tr>
<tr>
<td>S-6848-10-0</td>
<td>10,500 gallons</td>
<td>3020-05 B</td>
<td>1</td>
<td>93.00</td>
<td>93.00</td>
<td>A</td>
<td>250 BBL (NOMINAL) HEATER TREATER VESSEL, WITH PERMIT EXEMPT BURNER, SERVED BY VAPOR CONTROL SYSTEM LISTED ON PERMIT UNIT S-6848-8 (ASPHALTO FIELD)</td>
</tr>
<tr>
<td>S-6848-11-0</td>
<td>42,000 gallons</td>
<td>3020-05 C</td>
<td>1</td>
<td>135.00</td>
<td>135.00</td>
<td>A</td>
<td>1,000 BBL PRODUCED WATER TANK TIED TO A VAPOR CONTROL SYSTEM LISTED ON THE TANK PERMIT S-6848-8</td>
</tr>
</tbody>
</table>

Number of Facilities Reported: 1
Attachment B

Exempt Equipment
<table>
<thead>
<tr>
<th>Exemption Category</th>
<th>Rule 2020 Citation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Containers used to store refined lubricating oils</td>
<td>6.6.8</td>
</tr>
<tr>
<td>Unvented pressure vessels used exclusively to store liquefied gases or assoc with exempt equipment</td>
<td>6.6.9 or 6.13</td>
</tr>
<tr>
<td>Portable tanks used exclusively to store produced fluids for ≤ six months</td>
<td>6.6.10</td>
</tr>
<tr>
<td>Mobile transport tanks on delivery vehicles of VOCs</td>
<td>6.6.11</td>
</tr>
<tr>
<td>Loading racks used for the transfer of less than 4,000 gal/day of unheated organic material with initial boiling point ≥ 302 F or of fuel oil with specific gravity ≥0.8251</td>
<td>6.7.1.1</td>
</tr>
<tr>
<td>Loading racks used for the transfer of asphalt, crude or residual oil stored in exempt tanks, or crude oil with specific gravity ≥ 0.8762</td>
<td>6.7.1.2</td>
</tr>
<tr>
<td>Equipment used exclusively for the transfer of refined lubricating oil</td>
<td>6.7.2</td>
</tr>
<tr>
<td>Equipment used to apply architectural coatings</td>
<td>6.8.1</td>
</tr>
<tr>
<td>Unheated, non-conveyorized cleaning equipment with &lt; 10 ft² open area; using solvents with initial boiling point ≥ 248 F; and &lt; 25 gal/yr. evaporative losses</td>
<td>6.9</td>
</tr>
<tr>
<td>Brazing, soldering, or welding equipment</td>
<td>6.10</td>
</tr>
<tr>
<td>Equipment used to compress natural gas</td>
<td>6.11</td>
</tr>
<tr>
<td>Fugitive emissions sources assoc. with exempt equipment</td>
<td>6.12</td>
</tr>
<tr>
<td>Pits and Ponds as defined in Rule 1020</td>
<td>6.15</td>
</tr>
<tr>
<td>On-site roadmix manufacturing and the application of roadmix as a road base material</td>
<td>6.17</td>
</tr>
<tr>
<td>Emissions less than 2 lb/day from units not included above</td>
<td>6.19</td>
</tr>
<tr>
<td>Venting PUC quality natural gas from for sole purpose of pipeline and compressor repair and or maintenance</td>
<td>7.2</td>
</tr>
<tr>
<td>Non-structural repairs &amp; maintenance to permitted equipment</td>
<td>7.3</td>
</tr>
<tr>
<td>Detonation of explosives ≤ 100 lb/day and 1,000 lb/year</td>
<td>7.4</td>
</tr>
</tbody>
</table>
Permit to Operate

FACILITY: S-6848
LEGAL OWNER OR OPERATOR: OCCIDENTAL OF ELK HILLS INC
MAILING ADDRESS: 10800 STOCKDALE HIGHWAY
                    BAKERSFIELD, CA 93311
FACILITY LOCATION: HEAVY OIL WESTERN
FACILITY DESCRIPTION: OIL PRODUCTION

EXPIRATION DATE: 08/31/2015

The Facility’s Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

Seyed Sadredin
Executive Director / APCO

David Warner
Director of Permit Services
San Joaquin Valley
Air Pollution Control District

FACILITY: S-6848-0-0
EXPIRATION DATE: 08/31/2015

FACILITY-WIDE REQUIREMENTS

1. Facilities S-6848 and S-1327 constitute one stationary source. [District Rule 2201]

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: OCCIDENTAL OF ELK HILLS INC
Location: HEAVY OIL WESTERN

P-6548-3-0  Sep 18 2012 8:43AM  - TO/RID
PERMIT UNIT REQUIREMENTS

1. Formerly S-1372-380.

2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

3. FWKO vapors shall be vented only to vapor control system described on tank permit S-6848-8. [District NSR Rule]

4. FWKO vessel shall be designed and maintained to vent only to vapor control system maintained at no less than 99%. [District NSR Rule]

5. The true vapor pressure (TVP) of the liquids stored in this FWKO vessel shall not exceed 0.5 psia. [District Rule 4623 and NSR]

6. VOC emission rate from components in gas and light crude oil service associated with this emissions unit shall be less than 0.5 lb/day. [District Rule 2201]

7. All piping, valves, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201]

8. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit. [District Rule 2201]

9. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District Rule 2201]

10. The operator shall conduct true vapor pressure (TVP) testing of the organic liquid stored in a representative tank upon startup and at least once every 24 months thereafter during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored. [District Rule 4623]

11. Tank roof, tank shell, tank vapor space appurtenances, vapor control system piping, and vapor control system components shall be inspected and monitored using EPA Method 21 at least monthly. Items found to be not leaking may then be inspected and monitored at least once every 3 months until a leak is detected at which time the inspection and monitoring frequency shall revert to monthly until such time that two consecutive monthly inspections reveal with no leaks at which time the inspection and monitoring frequency shall revert to at least once every 3 months. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.
12. A visible mist, liquid dripping at the rate of more than 3 drops per minute, and vapor leaks of 50,000 ppm or greater VOC as methane shall be repaired as expeditiously as possible but in no case beyond 24 hours of detecting the leak and shall be re-monitored using EPA Method 21 upon completion of the repair. Vapor leaks equal to or greater than 10,000 ppm and less than 50,000 ppm VOC as methane shall be repaired within 5 days of detecting the leak and re-monitored using EPA Method 21 upon completion of the repair. Vapor leaks equal to or greater than 1,000 ppm and less than 10,000 ppm VOC as methane shall be repaired within 14 days of leak detection and shall be re-monitored using EPA Method 21 upon completion of the repair. [District Rule 2201]

13. Upon detection of a leak, permittee shall tag the leak with a uniquely numbered tag, and shall record the leak location, component leaking, identification tag number, leak magnitude, date of leak detection, date of repair, method of repair, and post-repair monitoring measurement. Such records of leaks shall be maintained current and shall be made readily available for District inspection upon request. [District Rule 2201]

14. Components not accessible for EPA Method 21 inspection shall be visually and auditorily checked for leaks at least weekly and shall be monitored using EPA Method 21 at least annually. Any leak detected visually or auditorially shall be recorded and the leak shall be repaired within 14 days of leak detection and shall be re-monitored using EPA Method 21 upon completion of the repair. Any leak detected using EPA Method 21 shall be repaired according the leak magnitude as described above and shall be re-monitored using EPA Method 21 upon completion of the repair. [District Rule 2201]

15. In addition to the requirements above, pressure relief devices shall be inspected and monitored for leaks within 3 days of any known, likely, or suspected venting of such devices. [District Rule 2201]


17. Permittee shall maintain an accurate fugitive component count and resultant emissions calculated using emission factors from CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities", Table IV-2c (Feb 1999), Screening Range Emissions Factors. [District Rule 2201]

18. The permittee shall keep accurate records of the dates of inspection and monitoring and the components inspected and monitored. [District Rule 2201]

19. The permittee shall keep accurate records of liquids stored, TVP and API gravity of such liquids for a period of 5 years and shall make such records available for District inspection upon request. [District Rule 4623]

20. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623]

These terms and conditions are part of the Facility-wide Permit to Operate.
San Joaquin Valley  
Air Pollution Control District  

PERMIT UNIT: S-6848-8-1  
EXPIRATION DATE: 08/31/2015  
SECTION: SE35  TOWNSHIP: 30S  RANGE: 22E  
EQUIPMENT DESCRIPTION:  
1,000 BBL FIXED ROOF CRUDE OIL WASH TANK WITH TANK VAPOR CONTROL SYSTEM SHARED WITH PERMITS S-6848-7, '7-9, AND '7-10 AND '7-11; INCLUDING COMPRESSOR(S), VAPOR PIPING, AND SULFA TREAT SULFUR SCRUBBER (ASPHALTO FIELD)  

PERMIT UNIT REQUIREMENTS  

1. Formerly S-1372-381.  
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]  
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]  
4. Tank vapors shall be vented only to the vapor control system. [District Rule 2201]  
5. VOC emissions from components associated with this emission unit in gas and light crude oil service shall be less than 0.5 pounds per day. [District Rule 2201]  
6. The true vapor pressure of the liquids stored in this tank shall be less than 0.5 psia. [District Rules 4623]  
7. All piping, valves, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201]  
8. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit. [District Rule 2201]  
9. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District Rule 2201]  
10. The operator shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank. [District Rule 4623]  
12. Tank roof, tank shell, tank vapor space appurtenances, vapor control system piping, and vapor control system components shall be inspected and monitored using EPA Method 21 at least monthly. Items found to be not leaking may then be inspected and monitored at least once every 3 months until a leak is detected at which time the inspection and monitoring frequency shall revert to monthly until such time that two consecutive monthly inspections reveal with no leaks at which time the inspection and monitoring frequency shall revert to at least once every 3 months. [District Rule 2201]
13. Upon detection of a leak, permittee shall tag the leak with a uniquely numbered tag, and shall record the leak location, component leaking, identification tag number, leak magnitude, date of leak detection, date of repair, method of repair, and post-repair monitoring measurement. Such records of leaks shall be maintained current and shall be made readily available for District inspection upon request. [District Rule 2201]

14. Permittee shall maintain an accurate fugitive component count and resultant emissions calculated using emission factors from CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities", Table IV-2c (Feb 1999), Screening Range Emissions Factors. [District Rule 2201]

15. The permittee shall keep records of the dates of inspection and monitoring and the components inspected and monitored. [District Rule 2201]

16. Operator shall determine the true vapor pressure of the petroleum liquid stored in the tank. 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, shall be used to determine the TVP of crude oil with an API gravity of 260 or less, or for any API gravity that is specified in this test method. [District Rule 4623]

17. The permittee shall keep accurate records of liquids stored, TVP and API gravity of such liquids for a period of 5 years and shall make such records available for District inspection upon request. [District Rule 4623]

18. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623]

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

1. Formerly S-1372-382.
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Tank vapors shall be vented only to vapor control system described on tank permit S-6848-8. [District NSR Rule]
4. VOC emission rate from components in gas and light crude oil service associated with this emissions unit shall be less than 0.5 lb/day. [District Rule 2201]
5. The true vapor pressure of the liquids stored in this tank shall not exceed 0.5 psia. [District Rules 4623 and NSR]
6. All piping, valves, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201]
7. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit. [District Rule 2201]
8. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District Rule 2201]
9. The operator shall conduct true vapor pressure (TVP) testing of the organic liquid stored in a representative tank upon startup, and at least once every 24 months thereafter during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank. [District Rule 4623]
11. Tank roof, tank shell, tank vapor space appurtenances, vapor control system piping, and vapor control system components shall be inspected and monitored using EPA Method 21 at least monthly. Items found to be not leaking may then be inspected and monitored at least once every 3 months until a leak is detected at which time the inspection and monitoring frequency shall revert to monthly until such time that two consecutive monthly inspections reveal with no leaks at which time the inspection and monitoring frequency shall revert to at least once every 3 months. [District Rule 2201]
12. Upon detection of a leak, permittee shall tag the leak with a uniquely numbered tag, and shall record the leak location, component leaking, identification tag number, leak magnitude, date of leak detection, date of repair, method of repair, and post-repair monitoring measurement. Such records of leaks shall be maintained current and shall be made readily available for District inspection upon request. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.
13. Operator shall determine the true vapor pressure of the petroleum liquid stored in a representative tank. 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, shall be used to determine the TVP of crude oil with an API gravity of 26° or less, or for any API gravity that is specified in this test method. [District Rule 4623]

14. Permittee shall maintain an accurate fugitive component count and resultant emissions calculated using emission factors from CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities", Table IV-2c (Feb 1999), Screening Range Emissions Factors. [District Rule 2201]

15. The permittee shall keep accurate records of the dates of inspection and monitoring and the components inspected and monitored. [District Rule 2201]

16. The permittee shall keep accurate records of liquids stored, TVP and API gravity of such liquids for a period of 5 years and shall make such records available for District inspection upon requests. [District Rule 4623]

17. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623]
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-6848-10-0  EXPIRATION DATE: 08/31/2015
SECTION: SE35  TOWNSHIP: 30S  RANGE: 22E

EQUIPMENT DESCRIPTION:
250 BBL (NOMINAL) HEATER TREATER VESSEL, WITH PERMIT EXEMPT BURNER, SERVED BY VAPOR CONTROL SYSTEM LISTED ON PERMIT UNIT S-6848-8 (ASPHALTO FIELD)

PERMIT UNIT REQUIREMENTS

1. Formerly S-1372-383.

2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

3. Tank vapors shall be vented only to vapor control system described on tank permit S-6848-8. [District NSR Rule]

4. VOC emission rate from components in gas and light crude oil service associated with this emissions unit shall be less than 0.5 lb/day. [District Rule 2201]

5. The true vapor pressure of the liquids stored in this tank shall not exceed 0.5 psia. [District Rules 4623 and NSR]

6. Tank shall be designed and maintained to vent only to vapor control system maintained at no less than 99%. [District NSR Rule]

7. All piping, valves, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201]

8. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit. [District Rule 2201]

9. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District Rule 2201]

10. Operator shall register the heater treater burner with the District no later than January 1, 2008 in accordance with Rule 2250 (Stationary Equipment Registration) [District Rule 4307, 6.4]

11. Heater treater permit exempt burner shall have a maximum heat input rating capacity of 5 MMBtu/hr, and shall burn fuel which contains no more than five percent by weight hydrocarbons heavier than butane (as determined by test method ASTM E-260-73) and no more than 0.75 grains of total sulfur per 100 standard cubic feet of gas (as determined by test method ASTM D-1072-80). [District Rule 2020, 6.1.1]

12. The operator shall conduct true vapor pressure (TVP) testing of the organic liquid stored in a representative tank upon startup, and at least once every 24 months thereafter during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank. [District Rule 4623]


PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.
14. Tank roof, tank shell, tank vapor space appurtenances, vapor control system piping, and vapor control system components shall be inspected and monitored using EPA Method 21 at least monthly. Items found to be not leaking may then be inspected and monitored at least once every 3 months until a leak is detected at which time the inspection and monitoring frequency shall revert to monthly until such time that two consecutive monthly inspections reveal with no leaks at which time the inspection and monitoring frequency shall revert to at least once every 3 months. [District Rule 2201]

15. Upon detection of a leak, permittee shall tag the leak with a uniquely numbered tag, and shall record the leak location, component leaking, identification tag number, leak magnitude, date of leak detection, date of repair, method of repair, and post-repair monitoring measurement. Such records of leaks shall be maintained current and shall be made readily available for District inspection upon request. [District Rule 2201]

16. Operator shall determine the true vapor pressure of the petroleum liquid stored in a representative tank. 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, shall be used to determine the TVP of crude oil with an API gravity of 260 or less, or for any API gravity that is specified in this test method. [District Rule 4623]

17. Permittee shall maintain an accurate fugitive component count and resultant emissions calculated using emission factors from CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities", Table IV-2c (Feb 1999), Screening Range Emissions Factors. [District Rule 2201]

18. The permittee shall keep accurate records of liquids stored, TVP and API gravity of such liquids for a period of 5 years and shall make such records available for District inspection upon request. [District Rule 4623]

19. The permittee shall keep accurate records of the dates of inspection and monitoring and the components inspected and monitored. [District Rule 2201]

20. The permittee shall keep accurate records of sulfur content of fuel gas burned in the heater treater permit exempt burner, and the percent by weight hydrocarbons heavier than butane in the fuel gas, for a period of 5 years and shall make such records available for District inspection upon request. [District Rule 2080]

21. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623]

These terms and conditions are part of the Facility-wide Permit to Operate.
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-6848-11-0
EXPIRATION DATE: 08/31/2015

EQUIPMENT DESCRIPTION:
1,000 BBL PRODUCED WATER TANK TIED TO A VAPOR CONTROL SYSTEM LISTED ON THE TANK PERMIT S-6848-8

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. 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]
3. Tank vapors shall be vented only to the vapor control system. [District Rule 2201]
4. VOC emissions from components associated with this emission unit in gas and light crude oil service shall be less than 0.5 pounds per day. [District Rules 2201 and 4102]
5. All piping, valves, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 2201]
6. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit. [District Rule 2201]
7. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District Rule 2201]
8. The true vapor pressure of the liquids stored in this tank shall be less than 0.5 psia. [District Rules 4623]
9. TVP testing of the liquid stored in this tank shall be conducted at actual storage temperature upon connecting this tank to the vapor control system, and at least once every 24 months thereafter during summer (July-September), and or whenever there is a change in the source or type of liquid stored in this tank. [District Rule 4623]
10. TVP testing results shall be submitted within 45 days after the date of testing. [District Rule 4623]
11. TVP testing shall be determined by measuring the Reid Vapor Pressure (RVP) using ASTM D 323-94 (Test Method for Vapor Pressure for Petroleum Products) and converting the RVP to TVP at the tank’s maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance with the procedures in Appendix B of Rule 4623. Should it be determined that another set of test methods is more appropriate for TVP testing, such test methods shall be approved by the District and USEPA before testing. [District Rule 4623]
12. Permittee shall maintain an accurate fugitive component count and resultant emissions calculated using emission factors from CAPCOA’s "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities", Table IV-2c (Feb 1999), Screening Range Emissions Factors. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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13. Tank roof, tank shell, tank vapor space appurtenances, vapor control system piping, and vapor control system components shall be inspected and monitored using EPA Method 21 at least monthly. Items found to be not leaking may then be inspected and monitored at least once every 3 months until a leak is detected at which time the inspection and monitoring frequency shall revert to monthly until such time that two consecutive monthly inspections reveal with no leaks at which time the inspection and monitoring frequency shall revert to at least once every 3 months. [District Rule 2201]

14. Upon detection of a leak, permittee shall tag the leak with a uniquely numbered tag, and shall record the leak location, component leaking, identification tag number, leak magnitude, date of leak detection, date of repair, method of repair, and post-repair monitoring measurement. Such records of leaks shall be maintained current and shall be made readily available for District inspection upon request. [District Rule 2201]

15. The permittee shall keep records of the dates of inspection and monitoring and the components inspected and monitored. [District Rule 2201]

16. The permittee shall keep accurate records of liquids stored, TVP of such liquids for a period of 5 years and shall make such records available for District inspection upon request. [District Rule 4623]

17. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623]