



DEC 2 3 2011

Larry Landis Chevron U.S.A., Inc. P.O. Box 1392 Bakersfield, CA 93302

Notice of Final Action - Authority to Construct

**Project Number: S-1102789** 

Dear Mr. Landis:

The Air Pollution Control Officer has issued Authority to Construct permits to Chevron U.S.A., Inc. for the addition of 400 thermally enhanced wells, at Chevron's Heavy Oil Central Stationary Source.

Enclosed are copies of the Authority to Construct permits and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue this Authority to Construct was published on October 20, 2011. The District's analysis of the proposal was also sent to CARB on October 17, 2011. No comments were received following the District's preliminary decision on this project.

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

Sincerely,

David Warner

Director of Permit Services

DW: KTR/cm

**Enclosures** 

Seyed Sadredin

Executive Director/Air Pollution Control Officer

www.valleyair.org

Southern Region





DEC 2 3 2011

Mike Tollstrup, Chief **Project Assessment Branch** Stationary Source Division California Air Resources Board PO Box 2815 Sacramento, CA 95812-2815

RE: Notice of Final Action - Authority to Construct

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Sincerely.

David Warner

<del>D</del>irector of Permit Services

DW:: KTR/cm

Enclosures

Seyed Sadredin Executive Director/Air Pollution Control Officer

# NOTICE OF FINAL ACTION FOR THE ISSUANCE OF AUTHORITY TO CONSTRUCT PERMITS

NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued Authority to Construct permits to Chevron U.S.A., Inc. for the addition of 400 thermally enhanced wells, at Chevron's Heavy Oil Central Stationary Source.

No comments were received following the District's preliminary decision on this project.

The application review for Project #S-1102789 is available for public inspection at http://www.valleyair.org/notices/public\_notices\_idx.htm and the SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 34946 FLYOVER COURT, BAKERSFIELD, CA 93308.





## **AUTHORITY TO CONSTRUCT**

PERMIT NO: S-1131-1036-10 ISSUANCE DATE: 12/19/2011

**LEGAL OWNER OR OPERATOR:** CHEVRON USA INC

MAILING ADDRESS: PO BOX 1392

BAKERSFIELD, CA 93302

LOCATION: HEAVY OIL CENTRAL KERN COUNTY, CA

#### **EQUIPMENT DESCRIPTION:**

MODIFICATION OF TEOR OPERATION WITH 485 CYCLIC AND STEAM DRIVE WELLS WITH CLOSED CASING VENTS: ADD 400 WELLS TO WELL ROSTER, UPDATE EMISSION FACTORS BY USING CAPCOA SCREENING FACTORS, REVISE EQUIPMENT DESCRIPTION TO READ "885 THERMALLY ENHANCED WELLS WITH CLOSED CASING VENTS"

### CONDITIONS

- 1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
- 2. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter 8,516 lb, 2nd quarter 8,516 lb, 3rd quarter 8,516 lb, and fourth quarter 8,516 lb. The offset amounts listed above include the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 9/21/06). [District Rule 2201]
- 3. ERC Certificate Number S-2887-1 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201]
- 4. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the emission control requirements of District Rule 4401, 5.0. [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
- 5. All valves, fittings and connectors serving closed well vents shall be constructed and maintained in accordance with leak standards described in Rule 4401 except during periods of actual service and repair. [District Rules 2201 and 4401]

#### CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

- 6. Wells authorized by this permit shall only be operated with closed casing vents. Well casing vents shall remain closed at all times except during periods of actual service or repair provided such activity is attended and done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere, and the front line production equipment downstream of the wells that carry produced fluids be connected to a VOC collection and control system. [District Rules 2201 and 4401]
- 7. Fluids produced from these steam-enhanced wells with closed well casing vents shall be introduced only to tanks vented to a District approved vapor collection and control system, or to permit exempt storage equipment as defined by Rule 2020, Section 6.6. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. Total fugitive emission of volatile organic compounds (VOC) from entire operation shall not exceed 146.6 lb/day. [District Rule 2201]
- Permittee shall maintain with the permit accurate fugitive component counts for well vent vapor control systems and
  resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass
  Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c(Feb 1999) Screening Range emission
  factors. [District Rule 2201]
- 10. The operator shall be in violation of Rule 4401 if any District inspection or if any operator inspection conducted pursuant to Rule 4401, Section 5.8 are found to be leaking in excess of the applicable leak standards in section 5.6.2. [District Rule 4401, 5.6.1]
- 11. There shall not be an open-ended line or a valve located at the end of the line that is not sealed with a blind flange, plug, cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended lines. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401, 5.6.2.1]
- 12. There shall be no components with major liquid leaks or with gas leaks greater than 50,000 ppmv. [District Rule 4401, 5.6.2.2 and 5.6.2.3]
- 13. There shall not be more minor liquid leaks, minor gas leaks, or gas leaks greater than 10,000 ppmv up to 50,000 ppmv than the following: 3 leaks for 1 25 wells, 6 leaks for 26 50 wells, 8 leaks for 51 100 wells, 10 leaks for 101 250 wells, 15 leaks for 251 500 wells, and 1 leak for each 20 wells (with a minimum of 50 wells test) for more than 500 wells connected to a VOC collection and control system. [District Rule 4401, 5.6.2.4]
- 14. Components that have been found leaking in excess of the applicable leak standards of this rule may be used provided such leaking components have been identified with a tag for repair, are repaired, or are awaiting re-inspection after being repaired, within the applicable time period specified in this permit. [District Rule 4401, 5.7.1]
- 15. Except for pipes and unsafe-to-monitor components, all other components shall be inspected pursuant to the requirements of section 6.3.3 at least once every year. [District Rule 4401,5.8.1]
- 16. All pipes shall be visually inspected at least once every year. Any visual inspection of pipes that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected within 24 hours after detecting the leak. If a leak is found, the leak shall be repaired as soon as practicable but not later than as allowed by Rule 4401 and specified in this permit. [District Rule 4401, 5.8.2]
- 17. The operator shall inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. The operator shall inspect a component, other than PRDs, that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. The operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401, 5.8.4.2, 5.8.4.3, 5.8.5]
- 18. A District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. [District Rule 4401, 5.8.6]

- 19. The operator, upon detection of a leaking component, shall affix to that component a weatherproof, readily visible tag, bearing the date and time when the leak was detected and the date and time of the leak measurement. For gaseous leaks, the tag shall indicate the leak concentration in ppmv. For liquid leaks, the tag shall indicate whether it is a major liquid leak or a minor liquid leak. The tag shall indicate, when applicable, whether the component is an essential component, an unsafe-to-monitor component, or a critical component. The tag shall remain in place until the leaking component is repaired or replaced and reinspected and found to be in compliance with the requirements of this rule. [District Rule 4401 5.9.1, 5.9.2]
- 20. The operator shall minimize all component leaks immediately, to the extent possible, but not later than one hour after detection of the leak in order to stop or reduce leakage to the atmosphere. Except for leaking critical components or leaking essential components, if the leak has been minimized but the leak still exceeds the applicable leak standards specified in this permit, the operator shall do one of the following within the timeframes specified within this permit:

   repair or replace the leaking component;
   vent the leaking component to a closed vent system;
   or remove the leaking component from operation. A closed vent system is a District approved system that is not open to the atmosphere. It is composed of hard-piping, ductwork connections and, if necessary, flow inducing devices that transport gas or vapor from a piece or pieces of equipment to a District approved control device that has a overall VOC collection and destruction or removal efficiency of at least 99%, or that transports gases or vapors back to a process system. [District Rule 4401, 5.9.4]
- 21. The operator shall repair minor gas leaks within 14 days, major gas leaks which less than or equal to 50,000 ppmv within 5 days, major gas leaks which are greater than 50,000 ppmv within two days, minor liquid leaks within 3 days, and major liquid leaks within 2 days. The leak rate measured after leak minimization has been performed shall be the leak rate used to determine the applicable repair period. The start of the repair period shall be the time of the initial leak detection. [District Rule 4401, 5.9.4, 5.9.5, and 5.9.6]
- 22. If a leaking component is an essential component or a critical component which cannot be shut down immediately for repairs, and after being minimized still exceeds the applicable leak standard, the operator shall repair or replace the component to eliminate the leak during the next process unit turnaround or no later than one year from the date of original leak detection, which ever is earlier. [District Rule 4401, 5.9.7]
- 23. The operator of any steam-enhanced crude oil production well shall maintain records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401, 6.1.1]
- 24. An operator of any steam-enhanced crude oil production well shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system. [District Rule 4401, 6.1.3]
- 25. Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components. The records shall include a copy of the current calibration gas certification from the vendor of the calibration gas cylinder, the date of calibration, the concentration of calibration gas, the instrument reading of calibration gas before adjustment, the instrument reading of calibration gas after adjustment, the calibration gas expiration date, and the calibration gas cylinder pressure at the time of calibration. [District Rule 44019, 6.1.6]
- 26. Leak inspection, other than audio-visual, and measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. Where safety is a concern, such as measuring leaks from compressor seals or pump seals when the shaft is rotating, a person shall measure leaks by placing the instrument probe inlet at a distance of one (1) centimeter or less from the surface of the component interface. [District Rule 4401, 6.3.3]
- 27. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401, 6.3.5]

- 28. The operator shall maintain an inspection log that has been signed and dated by the facility operator responsible for the inspection, certifying the accuracy of the information recorded in the log. The inspection log shall contain, at a minimum, all of the following information: 1) The total number of components inspected, and the total number and percentage of leaking components found by component types; 2) The location, type, name or description of each leaking component and the description of any unit where the leaking component is found; 3) Date of the leak detection and method of the leak detection; 4) For gaseous leaks, record the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak; 5) The date of repair, replacement, or removal from operation of the leaking component(s); 6) The identification and location of essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes first; 7) The method(s) used to minimize the leak from essential components and critical components found leaking that cannot be repaired until the next process unit turnaround or not later than one year after leak detection, whichever comes earlier; 8) The date of re-inspection and the leak concentration in ppmv after the component is repaired or is replaced; 9) The inspector's name, business mailing address, and business telephone number. [District Rule 4401, 6.4]
- 29. The operator shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures, as necessary. [District Rule 4401, 6.5]
- 30. The operator shall maintain copies of training records and a copy of the latest APCO-approved Operator Management Plan (OMP) at the facility and make such available to the APCO, ARB, and US EPA upon request. [District Rule 4401, 6.1.7, 6.1.8]
- 31. The operator shall maintain an APCO approved Operator Management Plan (OMP). The OMP shall include, at a minimum, a description of all wells and all associated VOC collection and control systems subject to this rule, and all wells and all associated VOC collection and control systems that are exempt; an identification and description of any known hazard that might affect the safety of an inspector; except for pipes, the number of components that are subject to this rule by component type; except for pipes, the number and types of major components, inaccessible components, unsafe-to-monitor components, critical components, and essential components that are subject to this rule and the reason(s) for such designation; except for pipes, the location of components subject to the rule (components may be grouped together functionally by process unit or facility description); except for pipes, components exempt pursuant to Section 4.8 (except for components buried below ground) may be described in the OMP by grouping them functionally by process unit or facility description (the results of any laboratory testing or other pertinent information to demonstrate compliance with the applicable exemption criteria for components for which an exemption is being claimed pursuant to Sections 4.8 shall be submitted with the OMP); a detailed schedule of an operator's inspections of components to be conducted as required by this rule and whether the operator inspections of components required by this rule will be performed by a qualified contractor or by an in-house team; a description of the training standards for personnel that inspect and repair components; and a description of the leak detection training for conducting the test method specified in Section 6.3.3 for new operators, and for experienced operators, as necessary. [District Rule 4401, 6.6
- 32. By January 30th of each year the operator shall submit to the District for approval, in writing, an annual report indicating any changes to the existing OMP on file at the District. [District Rule 4401, 6.7]
- 33. Permittee shall maintain with the permit a listing (updated annually within 60 day of permit anniversary) of all steamenhanced wells authorized by this permit and such listing shall be made available for District inspection upon request. [District Rules 2201 and 1070]