



FEB 2 2 2011

Mr. John Haley Aera Energy, LLC PO Box 11164 Bakersfield, CA 93389-1164

Proposed ATC / Certificate of Conformity (Significant Mod)

**District Facility # S-1548** 

**Project # 1104985** 

Dear Mr. Haley:

Enclosed for your review is the District's analysis of an application for Authorities to Construct for the facility identified above. The applicant is requesting that Certificates of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. Aera requests that current vessel cleaning conditions be replaced by standard vessel cleaning conditions.

After addressing any EPA comments made during the 45-day comment period, the Authorities to Construct will be issued to the facility with Certificates of Conformity. Prior to operating with modifications authorized by the Authorities to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,

**Director of Permit Services** 

DW: DT/cm

Enclosures

Seyed Sadredin

Executive Director/Air Pollution Control Officer





FEB 2 2 2011

Gerardo C. Rios, Chief Permits Office Air Division U.S. EPA - Region IX 75 Hawthorne St. San Francisco, CA 94105

Re:

Proposed ATC / Certificate of Conformity (Significant Mod)

District Facility # S-1548

**Project # 1104985** 

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authorities to Construct for Aera Energy, LLC The equipment is located in Dehy 20 within the NW/4 of Section 20, Township 28S, Range 21E in Aera's Western Kern County Fields Light Oil stationary source, which has been issued a Title V permit. Aera Energy, LLC is requesting that Certificates of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. Aera requests that current vessel cleaning conditions be replaced by standard vessel cleaning conditions.

Enclosed is the engineering evaluation of this application with a copy of the current Title V permit and proposed Authorities to Construct # S-1548-478-3, '479-3. '480-3 and '481-3 with Certificates of Conformity. After demonstrating compliance with the Authority to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter. If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-

Thank you for your cooperation in this matter.

Sincerely,

David Warner

Director of Permit Services

DW: DT/cm

**Enclosures** 

Seyed Sadredin Executive Director/Air Pollution Control Officer

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

Central Region (Main Office) 1990 E. Gettysburg Avenue Fresno, CA 93726-0244 Tel: (559) 230-6000 FAX: (559) 230-6061

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





FEB 2 2 2011

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

Re:

Proposed ATC / Certificate of Conformity (Significant Mod)

District Facility # S-1548

**Project # 1104985** 

Dear Mr. Tollstrup:

Enclosed for your review is the District's analysis of an application for Authorities to Construct for the facility identified above. The applicant is requesting that Certificates of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. Aera requests that current vessel cleaning conditions be replaced by standard vessel cleaning conditions.

Enclosed is the engineering evaluation of this application with a copy of the current Title V permit and proposed Authorities to Construct # S-1548-478-3, '479-3, '480-3 and '481-3 with Certificates of Conformity. After demonstrating compliance with the Authorities to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 30-day comment period that begins on the date you receive this letter. If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,

**Director of Permit Services** 

DW: DT/cm

**Enclosures** 

Seyed Sadredin Executive Director/Air Pollution Control Officer

# NOTICE OF PRELIMINARY DECISION FOR THE ISSUANCE OF AUTHORITY TO CONSTRUCT AND THE PROPOSED SIGNIFICANT MODIFICATION OF FEDERALLY MANDATED OPERATING PERMIT

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed modification of Aera Energy, LLC for its Light Oil production facility. The equipment is located in Dehy 20 within the NW/4 of Section 20, Township 28S, Range 21E in Aera's Western Kern County Fields Light Oil stationary source, California. Aera requests that current vessel cleaning conditions be replaced by standard vessel cleaning conditions.

The District's analysis of the legal and factual basis for this proposed action, project #1104985. is available for public inspection http://www.valleyair.org/notices/public\_notices\_idx.htm and the District office at the address below. This will be the public's only opportunity to comment on the specific conditions of the modification. If requested by the public, the District will hold a public hearing regarding issuance of this modification. For additional information, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900. 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, 1990 E. GETTYSBURG AVE, FRESNO, CA 93726-0244.

# San Joaquin Valley Air Pollution Control District Authority to Construct Application Review

Storage Tanks

Facility Name: Aera Energy, LLC

Mailing Address: PO Box 11164 Engineer: David Torii

Bakersfield, CA 93389-1164 Lead Engineer: Allan Phillips April Lead Engineer: Allan Phillips April Lead Engineer:

Contact Person: John Haley

Telephone: 661-665-7424

Fax: 661-665-7437

E-Mail:

Application #(s): S-1548-478-3, '479-3, '480-3 and '481-3

Project #: 1104985

Deemed Complete: 12/01/10

#### I. Proposal

Aera Energy, LLC (Aera) requests Authorities to Construct (ATCs) to modify four induced static flotation cell permits by standardizing their vessel cleaning permit conditions. Aera requests that current vessel cleaning conditions be replaced by vessel cleaning conditions added in project S-1102743 (issued on 8/18/10).

#### The following vessel cleaning conditions will be removed:

- Permittee shall notify the District Compliance division at least 48 hours before induced static flotation unit cleaning and vapor control system disconnection and within 72 hours after returning the vessel to service. [District Rule 2080] Y
- Prior to opening the induced static flotation unit to allow tank cleaning one of the following options must be followed: 1) operate the vapor recovery system for at least 24 hours after all the liquid in the induced static flotation unit has been drained to the maximum extent feasible, 2) displace vapors floating the oil pad off with water such that 90% of the induced static flotation unit liquid capacity is displaced, 3) vent the induced static flotation unit to the vapor control system until the vapor concentration is less than 10% of the lower explosive limit (LEL) or 5,000 ppmv whichever is less; or 4) vent the induced static flotation unit to the vapor control system for a length of time determined by the following relationship: t = 2.3 V/Q, where t = time, V = induced static flotation unit volume (cubic feet), and Q= flow rate to the vapor control system as determined using appropriate engineering calculations. [District Rule 2080] Y
- The induced static flotation unit shall be cleaned using water, hot water, solvents with an initial boiling point of greater than 302 F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams VOC per liter or less. Sediment may be used for road mix as allowed by Section 6.17 of District Rule 2020. [District Rule 2080] Y

FEB 0 1 2011

- Steam cleaning shall be allowed only during December through March, or at locations where wastewater treatment facilities are limited. [District Rule 2080] Y
- Prior to reintroducing crude oil/water to the induced static flotation unit, the induced static flotation unit shall be filled to the maximum possible level with water or an organic liquid with a TVP less than 0.5 psia, the tank vapor control system shall be reactivated, and the liquid level shall be adjusted as necessary. Pressure/relief valve shall not open during filling of the induced static flotation unit. [District Rule 2080] Y
- Within 48 hours after refilling the induced static flotation unit with crude oil/water, the
  pressure relief valve seats and hatch seals shall be inspected for leaks using EPA
  method 21 and the regular tank maintenance and inspection program shall resume.
  [District Rule 2080] Y
- Permittee shall maintain records of each period of cleaning and maintenance when the
  induced static flotation unit is disconnected or isolated from the vapor control system.
  Records shall include the date that induced static flotation unit cleaning was initiated,
  the date induced static flotation unit cleaning was completed, the method of induced
  static flotation unit cleaning used, and a description of internal and external induced
  static flotation unit repairs and maintenance performed. Such records shall be retained
  for a period of at least 5 years and shall be made available for District inspection upon
  request. [District Rule 2080] Y

#### The following conditions will be added:

- Vessel may be disconnected from vapor control system during District approved cleaning and maintenance procedures as described in this permit. [District Rule 2080] Y
- Permittee shall notify the District Compliance Division at least 72 hours (notification period can be less if approved by District Compliance Division) before any vessel cleaning or maintenance which necessitates isolation from the vapor control system. [District Rule 2080] Y
- Prior to opening the vessel for cleaning or maintenance, one of the following procedures
  must be followed: 1) Prior to venting the vessel to the atmosphere, operate the vapor
  recovery system/vapor control device for at least 24 hours such that it collects the
  vapors; or 2) use liquid displacement, conducted using a liquid with a TVP less than 0.5
  psia, or conducted by floating the oil pad off by restricting the outflow of water, such that
  90% of the vessel volume is displaced; or 3) depressurize vessel to the on-site flare
  until the vessel reaches atmospheric pressure. [District Rule 2080] Y
- Upon reintroducing crude oil/water to the vessel, the vapor control system shall be reactivated and pressure relief valves closed. [District Rule 2080] Y
- Within 48 hours after refilling the vessel with crude oil/water, the pressure relief valves that discharge to atmosphere and hatch seals shall be inspected for leaks using EPA

Method 21 and the regular maintenance and inspection program shall resume. [District Rule 2080] Y

- While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 °F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 2201] Y
- Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 2201] Y
- If this tank was holding organic liquids with a TVP of 1.5 psia or greater then during sludge removal, the operator shall control emissions from the sludge receiving vessel by operating an APCO-approved vapor control device that reduces emissions of organic vapors by at least 95%. [District Rule 2201] Y
- If this tank was holding organic liquids with a TVP of 1.5 psia or greater then the operator shall only transport removed sludge in closed, liquid leak-free containers.
   [District Rule 2201] Y
- If this tank was holding organic liquids with a TVP of 1.5 psia or greater then the
  operator shall store removed sludge, until final disposal, in vapor leak-free containers,
  or in tanks complying with the vapor control requirements of District Rule 4623. Sludge
  that is to be used to manufacture roadmix, as defined in District Rule 2020, is not
  required to be stored in this manner. Roadmix manufacturing operations exempt
  pursuant to District Rule 2020 shall maintain documentation of their compliance with
  Rule 2020, and shall readily make said documentation available for District inspection
  upon request. [District Rules 2020 and 2201] Y
- Permittee shall maintain records of each period of cleaning and maintenance when the
  vessel is disconnected or isolated from the vapor control system. Records shall include
  the date that cleaning was initiated, the date cleaning was completed, the procedure
  used to vent vapors prior to opening, and a description of internal and external repairs
  and maintenance performed. [District Rule 2080] Y

Aera received their Title V Permit on 10/30/01. This modification can be classified as a Title V significant modification pursuant to Rule 2520, Section 3.29, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. Aera must apply to administratively amend their Title V Operating Permit to include the requirements of the ATC(s) issued with this project.

#### II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (9/21/06)
Rule 2520	Federally Mandated Operating Permits (6/21/01)
Rule 4101	Visible Emissions (2/17/05)
Rule 4102	Nuisance (12/17/92)

Rule 4409 Components at Light Crude Oil Production Facilities, Natural Gas

Production Facilities and Natural Gas Processing Facilities (4/20/05)

Rule 4623 Storage of Organic Liquids (5/19/05)

Rule 4801 Sulfur Compounds (12/17/92)

CH&SC 41700 Health Risk Assessment (5/19/05)

CH&SC 42301.6 School Notice

Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)

California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

#### III. Project Location

The equipment is located in Dehy 20 within the NW/4 of Section 20, Township 28S, Range 21E in Aera's Light Oil Western stationary source. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

#### IV. Process Description

Induced static flotation (ISF) units utilizes an air stream to remove the suspended matter, both oil and solids, from water by dissolving air under pressure and then releasing the air at atmospheric pressure. The released air and any entrained VOCs are then collected by a vapor control system. The produced water is then temporarily stored in the produced water tanks until the water is sent for disposal. The vapors from the induced static flotation unit are captured by the vapor control system. The vapors are piped to the field gas system or an emergency flare.

As ISF's are considered to be pressure vessels pursuant to section 3 of Rule 4623 and are therefore exempt from Rule 4623.

#### V. Equipment Listing

#### Pre-Project Equipment Description (see PTOs in Appendix A):

S-1548-478-1: 26,000 GALLON (10 FT DIAMETER X 40 FT SHELL LENGTH) INDUCED

STATIC FLOTATION CELL V-240B VENTED TO VAPOR CONTROL SYSTEM

LISTED ON S-1548-144 (DEHY 20)

S-1548-479-1: 26.000 GALLON (10 FT DIAMETER X 40 FT SHELL LENGTH) INDUCED

STATIC FLOTATION CELL V-240C VENTED TO VAPOR CONTROL SYSTEM

LISTED ON S-1548-144 (DEHY 20)

S-1548-480-1: 26,000 GALLON (10 FT DIAMETER X 40 FT SHELL LENGTH) INDUCED

STATIC FLOTATION CELL V-240D VENTED TO VAPOR CONTROL SYSTEM

LISTED ON S-1548-144 (DEHY 20)

S-1548-481-1: 26,000 GALLON (10 FT DIAMETER X 40 FT SHELL LENGTH) INDUCED

STATIC FLOTATION CELL V-240E VENTED TO VAPOR CONTROL SYSTEM

LISTED ON S-1548-144 (DEHY 20)

#### Proposed ATCs:

- S-1548-478-3: MODIFICATION OF 26,000 GALLON (10 FT DIAMETER X 40 FT SHELL LENGTH) INDUCED STATIC FLOTATION CELL V-240B VENTED TO VAPOR CONTROL SYSTEM LISTED ON S-1548-144 (DEHY 20): ADD STANDARD VESSEL CLEANING CONDITIONS
- S-1548-479-3: MODIFICATION OF 26,000 GALLON (10 FT DIAMETER X 40 FT SHELL LENGTH) INDUCED STATIC FLOTATION CELL V-240C VENTED TO VAPOR CONTROL SYSTEM LISTED ON S-1548-144 (DEHY 20): ADD STANDARD VESSEL CLEANING CONDITIONS
- S-1548-480-3: MODIFICATION OF 26,000 GALLON (10 FT DIAMETER X 40 FT SHELL LENGTH) INDUCED STATIC FLOTATION CELL V-240D VENTED TO VAPOR CONTROL SYSTEM LISTED ON S-1548-144 (DEHY 20): ADD STANDARD VESSEL CLEANING CONDITIONS
- S-1548-481-3: MODIFICATION OF 26,000 GALLON (10 FT DIAMETER X 40 FT SHELL LENGTH) INDUCED STATIC FLOTATION CELL V-240E VENTED TO VAPOR CONTROL SYSTEM LISTED ON S-1548-144 (DEHY 20): ADD STANDARD VESSEL CLEANING CONDITIONS

#### Post Project Equipment Description:

- S-1548-478-3: 26,000 GALLON (10 FT DIAMETER X 40 FT SHELL LENGTH) INDUCED STATIC FLOTATION CELL V-240B VENTED TO VAPOR CONTROL SYSTEM LISTED ON S-1548-144 (DEHY 20)
- S-1548-479-3: 26,000 GALLON (10 FT DIAMETER X 40 FT SHELL LENGTH) INDUCED STATIC FLOTATION CELL V-240C VENTED TO VAPOR CONTROL SYSTEM LISTED ON S-1548-144 (DEHY 20)
- S-1548-480-3: 26,000 GALLON (10 FT DIAMETER X 40 FT SHELL LENGTH) INDUCED STATIC FLOTATION CELL V-240D VENTED TO VAPOR CONTROL SYSTEM LISTED ON S-1548-144 (DEHY 20)
- S-1548-481-3: 26,000 GALLON (10 FT DIAMETER X 40 FT SHELL LENGTH) INDUCED STATIC FLOTATION CELL V-240E VENTED TO VAPOR CONTROL SYSTEM LISTED ON S-1548-144 (DEHY 20)

#### VI. Emission Control Technology Evaluation

Fugitive VOC emissions are the only source of emissions from the ISF units. The proposed new ISFs will be served by a shared vapor collection and control system which routes the non-condensable vapors to the gas gathering system or a flare for incineration. The use of vapor control systems is proven technology to minimize emissions from oilfield equipment such as storage and processing vessels. The vapor control system is expected to achieve 99% control efficiency during normal operations

#### VII. General Calculations

As shown below in section VIII.A this project does not meet the criteria for a Rule 2201 Modification, as defined in Section 3.26, and is not subject to the requirements of Rule 2201. Therefore, formal calculations for Rule 2201 are not necessary and no further discussion is required.

#### VIII. Compliance

#### Rule 2201 New and Modified Stationary Source Review Rule

#### A. Applicability

This rule shall apply to all new stationary sources and all **modifications** to existing stationary sources which are subject to the District permit requirements and after construction emit or may emit one or more affected pollutant.

Pursuant to section 3.24 a Modification is an action including at least one of the following items:

- 3.24.1.1 Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.
- 3.24.1.2 Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.
- 3.24.1.3 An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.
- 3.24.1.4 Addition of any new emissions unit which is subject to District permitting requirements.
- 3.24.1.5 A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

The proposed revisions are not a modification and the stationary source is not new; therefore, the rule does not apply.

#### Rule 2520 Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. Section 3.29 defines a significant permit modification as a "permit amendment that does not qualify as a minor permit modification or administrative amendment."

Section 3.20.2 states that a minor permit modifications "Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions". The current post vessel cleaning reporting requirement will be deleted, which is a relaxation in monitoring conditions. As a result, the proposed project constitutes a Significant Modification to the Title V Permit pursuant to Section 3.29.

#### Rule 4101 Visible Emissions

Rule 4101 states that 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.

The ISF units or the vapor control system are not expected to be a source of visible emissions.

Therefore, continued compliance with the requirements of this rule is expected.

#### Rule 4102 Nuisance

Section 4.0 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

#### California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – Risk Management Policy for Permitting New and Modified Sources specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

As demonstrated above, there are no increases in emissions associated with this project, therefore a health risk assessment is not necessary and no further risk analysis is required.

# Rule 4409 Components Serving Light Crude Oil or Gases at Light Crude Oil and Gas Production Facilities and Components at Natural Gas Processing Facilities

This rule limits VOC emissions from components at light crude oil production and natural gas processing facilities, and requires periodic inspection and necessary maintenance of all subject components in accordance with an operator management plan. Components in liquid service handling crude oil streams with API gravities greater than 30° are subject to the rule. However, the requirements of this rule do not apply to components subject to the requirements of District Rule 4623, which applies to components in vapor service including the existing Dehy 20 shared vapor recovery system.

Aera Energy will continue to administer a periodic inspection and maintenance (I&M) program in accordance with the District-approved Rule 4409 Operator Management Plan (OMP). Therefore, initial and ongoing compliance with the applicable provisions of this rule is expected.

#### Rule 4623 Storage of Organic Liquids

The ISF units are ASME coded pressure vessels. Pursuant to Section 4.1.1, pressure vessels are exempt from Rule 4623; therefore, the units are not subject to this rule.

#### California Health & Safety Code 42301.6 (School Notice)

Pursuant to California Health and Safety Code 42301.6, since this project will not result in an increase in emissions, a school notice is not required.

#### California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

#### **Greenhouse Gas (GHG) Significance Determination**

It is determined that no other agency has or will prepare an environmental review document for the project. Thus the District is the Lead Agency for this project.

The District's engineering evaluation (this document) demonstrates that the project would not result in an increase in project specific greenhouse gas emissions. The District therefore concludes that the project would have a less than cumulatively significant impact on global climate change.

Per District Policy, project specific greenhouse gas emissions less than or equal to 230 metric tons-CO2e/year are considered to be zero for District permitting purposes and are exempt from further environmental review.

#### **District CEQA Findings**

The District is the Lead Agency for this project because there is no other agency with broader statutory authority over this project. The District performed an Engineering Evaluation (this document) for the proposed project and determined that the activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant

effect on the environment. The District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15031 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

#### IX. Recommendation

Compliance with all applicable rules and regulations is expected. Issue subject to the permit conditions on the attached draft Authority to Construct in Appendix X.

Compliance with all applicable rules and regulations is expected. Pending a successful Public and ARB noticing period, issue Authorities to Construct S-1548-478-3, '479-3, '480-3 and '481-3 subject to the permit conditions on the attached draft Authority to Construct in Appendix X.

#### X. Billing Information

Annual Permit Fees				
Permit Number	Fee Schedule	Fee Description	Annual Fee	
S-1548-478-3	3020-5-3	26,000 gallons	\$135	
S-1548-479-3	3020-5-3	26,000 gallons	\$135	
S-1548-480-3	3020-5-3	26,000 gallons	\$135	
S-1548-481-3	3020-5-3	26,000 gallons	\$135	

# Appendix A Current PTOs

PERMIT UNIT: S-1548-478-1 EXPIRATION DATE: 05/31/2006

SECTION: NW20 TOWNSHIP: 28S RANGE: 21E

**EQUIPMENT DESCRIPTION:** 

26,000 GALLON (10 FT DIAMETER X 40 FT SHELL LENGTH) INDUCED STATIC FLOTATION CELL V-240B VENTED TO VAPOR CONTROL SYSTEM LISTED ON S-1548-

144 (DEHY 20)

### PERMIT UNIT REQUIREMENTS

- 1. Tank gauging or sampling devices shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District NSR Rule] Federally Enforceable Through Title V Permit
- 2. All piping valves and fittings shall be constructed and maintained in a gas tight condition, except during periods of vessel interior cleaning or inspection. 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. [District NSR Rule] Federally Enforceable Through Title V Permit
- 3. Vessel is a pressure vessel as defined by District Rule 4623, Section 3.20. [District Rule 4623] Federally Enforceable Through Title V Permit
- 4. When in service, vessel shall vent to vapor control system listed in S-1548-144, except during periods of vessel interior cleaning. Prior to disconnecting the vessel from the vapor control system, operator shall drain all liquid from the vessel to the maximum extent feasible and shall operate the vapor control system for 24 hours. The vapor control system connection(s) shall be blinded off when disconnected from the vessel. The operator shall notify the District prior to reconnecting the vessel to the vapor control system to recommence operation. [District NSR Rule] Federally Enforceable Through Title V Permit
- 5. VOC emission rate from vapor control components associated with this emissions unit shall not exceed 30.0 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
- 6. Permittee shall maintain an accurate fugitive component count and resultant emissions calculated using emission factors from U.S. EPA Publication 453/R-95-017, or other District approved factors. [District NSR Rule] Federally Enforceable Through Title V Permit
- 7. Except for periods of vessel cleaning or inspection, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times and shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 8. All piping, fittings, and valves directly affixed to the tank or associated with the tank vapor recovery system shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

- 9. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 10. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 11. Emissions from components which have been tagged by the facility operator for repair within 15 calendar days or which have been repaired and are awaiting re-inspection shall not be in violation of this permit.

  [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 12. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 13. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 14. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 15. This permit authorizes induced static flotation unit cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2080] Federally Enforceable Through Title V Permit
- 16. Permittee shall conduct induced static flotation unit cleaning and maintenance operations in accordance with District approved procedure as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
- 17. Induced static flotation unit may be disconnected from vapor control system during District approved cleaning and maintenance procedures as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
- 18. Permittee shall notify the District Compliance division at least 48 hours before induced static flotation unit cleaning and vapor control system disconnection and within 72 hours after returning the vessel to service. [District Rule 2080] Federally Enforceable Through Title V Permit

- 19. Prior to opening the induced static flotation unit to allow tank cleaning one of the following options must be followed: 1) operate the vapor recovery system for at least 24 hours after all the liquid in the induced static flotation unit has been drained to the maximum extent feasible, 2) displace vapors floating the oil pad off with water such that 90% of the induced static flotation unit liquid capacity is displaced, 3) vent the induced static flotation unit to the vapor control system until the vapor concentration is less than 10% of the lower explosive limit (LEL) or 5,000 ppmv whichever is less; or 4) vent the induced static flotation unit to the vapor control system for a length of time determined by the following relationship: t = 2.3 V/Q, where t = time, V = induced static flotation unit volume (cubic feet), and Q= flow rate to the vapor control system as determined using appropriate engineering calculations. [District Rule 2080] Federally Enforceable Through Title V Permit
- 20. The induced static flotation unit shall be cleaned using water, hot water, solvents with an initial boiling point of greater than 302 F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams VOC per liter or less. Sediment may be used for road mix as allowed by Section 6.17 of District Rule 2020.

  [District Rule 2080] Federally Enforceable Through Title V Permit
- 21. Steam cleaning shall be allowed only during December through March, or at locations where wastewater treatment facilities are limited. [District Rule 2080] Federally Enforceable Through Title V Permit
- 22. Prior to reintroducing crude oil/water to the induced static flotation unit, the induced static flotation unit shall be filled to the maximum possible level with water or an organic liquid with a TVP less than 0.5 psia, the tank vapor control system shall be reactivated, and the liquid level shall be adjusted as necessary.

  Pressure/relief valve shall not open during filling of the induced static flotation unit. [District Rule 2080] Federally Enforceable Through Title V Permit
- 23. Within 48 hours after refilling the induced static flotation unit with crude oil/water, the pressure relief valve seats and hatch seals shall be inspected for leaks using EPA method 21 and the regular tank maintenance and inspection program shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
- 24. Permittee shall maintain records of each period of cleaning and maintenance when the induced static flotation unit is disconnected or isolated from the vapor control system. Records shall include the date that induced static flotation unit cleaning was initiated, the date induced static flotation unit cleaning was completed, the method of induced static flotation unit cleaning used, and a description of internal and external induced static flotation unit repairs and maintenance performed. Such records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit
- 25. All records shall be maintained and retained on the premises for a period of at least five years and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1548-479-1

EXPIRATION DATE: 05/31/2006

SECTION: NW20 TOWNSHIP: 28S RANGE: 21E

**EQUIPMENT DESCRIPTION:** 

26,000 GALLON (10 FT DIAMETER X 40 FT SHELL LENGTH) INDUCED STATIC FLOTATION CELL V-240C VENTED TO VAPOR CONTROL SYSTEM LISTED ON S-1548-

144 (DEHY 20)

## **PERMIT UNIT REQUIREMENTS**

- 1. Tank gauging or sampling devices shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District NSR Rule] Federally Enforceable Through Title V Permit
- 2. All piping valves and fittings shall be constructed and maintained in a gas tight condition, except during periods of vessel interior cleaning or inspection. 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. [District NSR Rule] Federally Enforceable Through Title V Permit
- 3. Vessel is a pressure vessel as defined by District Rule 4623, Section 3.20. [District Rule 4623] Federally Enforceable Through Title V Permit
- 4. When in service, vessel shall vent to vapor control system listed in S-1548-144, except during periods of vessel interior cleaning. Prior to disconnecting the vessel from the vapor control system, operator shall drain all liquid from the vessel to the maximum extent feasible and shall operate the vapor control system for 24 hours. The vapor control system connection(s) shall be blinded off when disconnected from the vessel. The operator shall notify the District prior to reconnecting the vessel to the vapor control system to recommence operation. [District NSR Rule] Federally Enforceable Through Title V Permit
- 5. VOC emission rate from vapor control components associated with this emissions unit shall not exceed 30.0 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
- 6. Permittee shall maintain an accurate fugitive component count and resultant emissions calculated using emission factors from U.S. EPA Publication 453/R-95-017, or other District approved factors. [District NSR Rule] Federally Enforceable Through Title V Permit
- 7. Except for periods of vessel cleaning or inspection, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times and shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 8. All piping, fittings, and valves directly affixed to the tank or associated with the tank vapor recovery system shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

- 9. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 10. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 11. Emissions from components which have been tagged by the facility operator for repair within 15 calendar days or which have been repaired and are awaiting re-inspection shall not be in violation of this permit. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 12. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 13. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 14. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- This permit authorizes induced static flotation unit cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2080] Federally Enforceable Through Title V Permit
- 16. Permittee shall conduct induced static flotation unit cleaning and maintenance operations in accordance with District approved procedure as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
- 17. Induced static flotation unit may be disconnected from vapor control system during District approved cleaning and maintenance procedures as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
- 18. Permittee shall notify the District Compliance division at least 48 hours before induced static flotation unit cleaning and vapor control system disconnection and within 72 hours after returning the vessel to service. [District Rule 2080] Federally Enforceable Through Title V Permit

- 19. Prior to opening the induced static flotation unit to allow tank cleaning one of the following options must be followed: 1) operate the vapor recovery system for at least 24 hours after all the liquid in the induced static flotation unit has been drained to the maximum extent feasible, 2) displace vapors floating the oil pad off with water such that 90% of the induced static flotation unit liquid capacity is displaced, 3) vent the induced static flotation unit to the vapor control system until the vapor concentration is less than 10% of the lower explosive limit (LEL) or 5,000 ppmv whichever is less; or 4) vent the induced static flotation unit to the vapor control system for a length of time determined by the following relationship: t = 2.3 V/Q, where t = time, V = induced static flotation unit volume (cubic feet), and Q= flow rate to the vapor control system as determined using appropriate engineering calculations. [District Rule 2080] Federally Enforceable Through Title V Permit
- 20. The induced static flotation unit shall be cleaned using water, hot water, solvents with an initial boiling point of greater than 302 F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams VOC per liter or less. Sediment may be used for road mix as allowed by Section 6.17 of District Rule 2020. [District Rule 2080] Federally Enforceable Through Title V Permit
- 21. Steam cleaning shall be allowed only during December through March, or at locations where wastewater treatment facilities are limited. [District Rule 2080] Federally Enforceable Through Title V Permit
- 22. Prior to reintroducing crude oil/water to the induced static flotation unit, the induced static flotation unit shall be filled to the maximum possible level with water or an organic liquid with a TVP less than 0.5 psia, the tank vapor control system shall be reactivated, and the liquid level shall be adjusted as necessary.

  Pressure/relief valve shall not open during filling of the induced static flotation unit. [District Rule 2080] Federally Enforceable Through Title V Permit
- 23. Within 48 hours after refilling the induced static flotation unit with crude oil/water, the pressure relief valve seats and hatch seals shall be inspected for leaks using EPA method 21 and the regular tank maintenance and inspection program shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
- 24. Permittee shall maintain records of each period of cleaning and maintenance when the induced static flotation unit is disconnected or isolated from the vapor control system. Records shall include the date that induced static flotation unit cleaning was initiated, the date induced static flotation unit cleaning was completed, the method of induced static flotation unit cleaning used, and a description of internal and external induced static flotation unit repairs and maintenance performed. Such records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit
- 25. All records shall be maintained and retained on the premises for a period of at least five years and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-1548-480-1 EXPIRATION DATE: 05/31/2006

SECTION: NW20 TOWNSHIP: 28S RANGE: 21E

**EQUIPMENT DESCRIPTION:** 

26,000 GALLON (10 FT DIAMETER X 40 FT SHELL LENGTH) INDUCED STATIC FLOTATION CELL V-240D VENTED TO VAPOR CONTROL SYSTEM LISTED ON S-1548-

144 (DEHY 20)

### PERMIT UNIT REQUIREMENTS

- 1. Tank gauging or sampling devices shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. All piping valves and fittings shall be constructed and maintained in a gas tight condition, except during periods of vessel interior cleaning or inspection. 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. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. Vessel is a pressure vessel as defined by District Rule 4623, Section 3.20. [District Rule 4623] Federally Enforceable Through Title V Permit
- 4. When in service, vessel shall vent to vapor control system listed in S-1548-144, except during periods of vessel interior cleaning. Prior to disconnecting the vessel from the vapor control system, operator shall drain all liquid from the vessel to the maximum extent feasible and shall operate the vapor control system for 24 hours. The vapor control system connection(s) shall be blinded off when disconnected from the vessel. The operator shall notify the District prior to reconnecting the vessel to the vapor control system to recommence operation. [District NSR Rule] Federally Enforceable Through Title V Permit
- 5. VOC emission rate from vapor control components associated with this emissions unit shall not exceed 30.0 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
- 6. Permittee shall maintain an accurate fugitive component count and resultant emissions calculated using emission factors from U.S. EPA Publication 453/R-95-017, or other District approved factors. [District NSR Rule] Federally Enforceable Through Title V Permit
- 7. Except for periods of vessel cleaning or inspection, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times and shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 8. All piping, fittings, and valves directly affixed to the tank or associated with the tank vapor recovery system shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

- 9. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 10. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 11. Emissions from components which have been tagged by the facility operator for repair within 15 calendar days or which have been repaired and are awaiting re-inspection shall not be in violation of this permit. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 12. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 13. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 14. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 15. This permit authorizes induced static flotation unit cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2080] Federally Enforceable Through Title V Permit
- 16. Permittee shall conduct induced static flotation unit cleaning and maintenance operations in accordance with District approved procedure as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
- 17. Induced static flotation unit may be disconnected from vapor control system during District approved cleaning and maintenance procedures as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
- 18. Permittee shall notify the District Compliance division at least 48 hours before induced static flotation unit cleaning and vapor control system disconnection and within 72 hours after returning the vessel to service. [District Rule 2080] Federally Enforceable Through Title V Permit

- 19. Prior to opening the induced static flotation unit to allow tank cleaning one of the following options must be followed: 1) operate the vapor recovery system for at least 24 hours after all the liquid in the induced static flotation unit has been drained to the maximum extent feasible, 2) displace vapors floating the oil pad off with water such that 90% of the induced static flotation unit liquid capacity is displaced, 3) vent the induced static flotation unit to the vapor control system until the vapor concentration is less than 10% of the lower explosive limit (LEL) or 5,000 ppmv whichever is less; or 4) vent the induced static flotation unit to the vapor control system for a length of time determined by the following relationship: t = 2.3 V/Q, where t = time, V = induced static flotation unit volume (cubic feet), and Q= flow rate to the vapor control system as determined using appropriate engineering calculations. [District Rule 2080] Federally Enforceable Through Title V Permit
- 20. The induced static flotation unit shall be cleaned using water, hot water, solvents with an initial boiling point of greater than 302 F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams VOC per liter or less. Sediment may be used for road mix as allowed by Section 6.17 of District Rule 2020. [District Rule 2080] Federally Enforceable Through Title V Permit
- 21. Steam cleaning shall be allowed only during December through March, or at locations where wastewater treatment facilities are limited. [District Rule 2080] Federally Enforceable Through Title V Permit
- 22. Prior to reintroducing crude oil/water to the induced static flotation unit, the induced static flotation unit shall be filled to the maximum possible level with water or an organic liquid with a TVP less than 0.5 psia, the tank vapor control system shall be reactivated, and the liquid level shall be adjusted as necessary.

  Pressure/relief valve shall not open during filling of the induced static flotation unit. [District Rule 2080] Federally Enforceable Through Title V Permit
- 23. Within 48 hours after refilling the induced static flotation unit with crude oil/water, the pressure relief valve seats and hatch seals shall be inspected for leaks using EPA method 21 and the regular tank maintenance and inspection program shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
- 24. Permittee shall maintain records of each period of cleaning and maintenance when the induced static flotation unit is disconnected or isolated from the vapor control system. Records shall include the date that induced static flotation unit cleaning was initiated, the date induced static flotation unit cleaning was completed, the method of induced static flotation unit cleaning used, and a description of internal and external induced static flotation unit repairs and maintenance performed. Such records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit
- 25. All records shall be maintained and retained on the premises for a period of at least five years and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

**EXPIRATION DATE: 05/31/2006** 

PERMIT UNIT: S-1548-481-1

SECTION: NW20 TOWNSHIP: 28S RANGE: 21E

**EQUIPMENT DESCRIPTION:** 

26,000 GALLON (10 FT DIAMETER X 40 FT SHELL LENGTH) INDUCED STATIC FLOTATION CELL V-240E VENTED TO VAPOR CONTROL SYSTEM LISTED ON S-1548-

144 (DEHY 20)

## PERMIT UNIT REQUIREMENTS

- 1. Tank gauging or sampling devices shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District NSR Rule] Federally Enforceable Through Title V Permit
- 2. All piping valves and fittings shall be constructed and maintained in a gas tight condition, except during periods of vessel interior cleaning or inspection. 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. [District NSR Rule] Federally Enforceable Through Title V Permit
- 3. Vessel is a pressure vessel as defined by District Rule 4623, Section 3.20. [District Rule 4623] Federally Enforceable Through Title V Permit
- 4. When in service, vessel shall vent to vapor control system listed in S-1548-144, except during periods of vessel interior cleaning. Prior to disconnecting the vessel from the vapor control system, operator shall drain all liquid from the vessel to the maximum extent feasible and shall operate the vapor control system for 24 hours. The vapor control system connection(s) shall be blinded off when disconnected from the vessel. The operator shall notify the District prior to reconnecting the vessel to the vapor control system to recommence operation. [District NSR Rule] Federally Enforceable Through Title V Permit
- 5. VOC emission rate from vapor control components associated with this emissions unit shall not exceed 30.0 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
- 6. Permittee shall maintain an accurate fugitive component count and resultant emissions calculated using emission factors from U.S. EPA Publication 453/R-95-017, or other District approved factors. [District NSR Rule] Federally Enforceable Through Title V Permit
- 7. Except for periods of vessel cleaning or inspection, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times and shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 8. All piping, fittings, and valves directly affixed to the tank or associated with the tank vapor recovery system shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

- 9. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 10. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 11. Emissions from components which have been tagged by the facility operator for repair within 15 calendar days or which have been repaired and are awaiting re-inspection shall not be in violation of this permit. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 12. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 13. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 14. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 15. This permit authorizes induced static flotation unit cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2080] Federally Enforceable Through Title V Permit
- 16. Permittee shall conduct induced static flotation unit cleaning and maintenance operations in accordance with District approved procedure as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
- 17. Induced static flotation unit may be disconnected from vapor control system during District approved cleaning and maintenance procedures as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
- 18. Permittee shall notify the District Compliance division at least 48 hours before induced static flotation unit cleaning and vapor control system disconnection and within 72 hours after returning the vessel to service. [District Rule 2080] Federally Enforceable Through Title V Permit

- 19. Prior to opening the induced static flotation unit to allow tank cleaning one of the following options must be followed: 1) operate the vapor recovery system for at least 24 hours after all the liquid in the induced static flotation unit has been drained to the maximum extent feasible, 2) displace vapors floating the oil pad off with water such that 90% of the induced static flotation unit liquid capacity is displaced, 3) vent the induced static flotation unit to the vapor control system until the vapor concentration is less than 10% of the lower explosive limit (LEL) or 5,000 ppmv whichever is less; or 4) vent the induced static flotation unit to the vapor control system for a length of time determined by the following relationship: t = 2.3 V/Q, where t = time, V = induced static flotation unit volume (cubic feet), and Q= flow rate to the vapor control system as determined using appropriate engineering calculations. [District Rule 2080] Federally Enforceable Through Title V Permit
- 20. The induced static flotation unit shall be cleaned using water, hot water, solvents with an initial boiling point of greater than 302 F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams VOC per liter or less. Sediment may be used for road mix as allowed by Section 6.17 of District Rule 2020. [District Rule 2080] Federally Enforceable Through Title V Permit
- 21. Steam cleaning shall be allowed only during December through March, or at locations where wastewater treatment facilities are limited. [District Rule 2080] Federally Enforceable Through Title V Permit
- 22. Prior to reintroducing crude oil/water to the induced static flotation unit, the induced static flotation unit shall be filled to the maximum possible level with water or an organic liquid with a TVP less than 0.5 psia, the tank vapor control system shall be reactivated, and the liquid level shall be adjusted as necessary. Pressure/relief valve shall not open during filling of the induced static flotation unit. [District Rule 2080] Federally Enforceable Through Title V Permit
- 23. Within 48 hours after refilling the induced static flotation unit with crude oil/water, the pressure relief valve seats and hatch seals shall be inspected for leaks using EPA method 21 and the regular tank maintenance and inspection program shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
- 24. Permittee shall maintain records of each period of cleaning and maintenance when the induced static flotation unit is disconnected or isolated from the vapor control system. Records shall include the date that induced static flotation unit cleaning was initiated, the date induced static flotation unit cleaning was completed, the method of induced static flotation unit cleaning used, and a description of internal and external induced static flotation unit repairs and maintenance performed. Such records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit
- 25. All records shall be maintained and retained on the premises for a period of at least five years and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

# Appendix B Draft ATCs

# AUTHORITY TO CONSTRUCT

**PERMIT NO: S-1548-478-3** 

**LEGAL OWNER OR OPERATOR:** AERA ENERGY LLC

**MAILING ADDRESS:** 

PO BOX 11164

BAKERSFIELD, CA 93389-1164

LOCATION:

LIGHT OIL WESTERN STATIONARY SOURCE

SECTION: NW20 TOWNSHIP: 28S RANGE: 21E

**EQUIPMENT DESCRIPTION:** 

MODIFICATION OF 26,000 GALLON (10 FT DIAMETER X 40 FT SHELL LENGTH) INDUCED STATIC FLOTATION CELL V-240B VENTED TO VAPOR CONTROL SYSTEM LISTED ON S-1548-144 (DEHY 20): ADD STANDARD VESSEL CLEANING CONDITIONS

#### **CONDITIONS**

- {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
- {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
- Tank gauging or sampling devices shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District NSR Rule] Federally Enforceable Through Title V Permit
- All piping valves and fittings shall be constructed and maintained in a gas tight condition, except during periods of vessel interior cleaning or inspection. 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 ppmy, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District NSR Rule] Federally Enforceable Through Title V Permit
- Vessel is a pressure vessel as defined by District Rule 4623, Section 3.20. [District Rule 4623] Federally Enforceable Through Title V Permit
- When in service, vessel shall vent to vapor control system listed in S-1548-144, except during periods of vessel interior cleaning. [District NSR Rule] Federally Enforceable Through Title V Permit
- VOC emission rate from vapor control components associated with this emissions unit shall not exceed 30.0 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
- Permittee shall maintain an accurate fugitive component count and resultant emissions calculated using emission factors from U.S. EPA Publication 453/R-95-017, or other District approved factors. [District NSR Rule] Federally Enforceable Through Title V Permit
- 9. Except for periods of vessel cleaning or inspection, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times and shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

- 10. All piping, fittings, and valves directly affixed to the tank or associated with the tank vapor recovery system shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 11. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 12. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 13. Emissions from components which have been tagged by the facility operator for repair within 15 calendar days or which have been repaired and are awaiting re-inspection shall not be in violation of this permit. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 14. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 15. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 16. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 17. This permit authorizes induced static flotation unit cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2080] Federally Enforceable Through Title V Permit
- 18. Vessel may be disconnected from vapor control system during District approved cleaning and maintenance procedures as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
- 19. Permittee shall notify the District Compliance Division at least 72 hours (notification period can be less if approved by District Compliance Division) before any vessel cleaning or maintenance which necessitates isolation from the vapor control system. [District Rule 2080] Federally Enforceable Through Title V Permit

- 20. Prior to opening the vessel for cleaning or maintenance, one of the following procedures must be followed:

   Prior to venting the vessel to the atmosphere, operate the vapor recovery system/vapor control device for at least 24 hours such that it collects the vapors; or 2) use liquid displacement, conducted using a liquid with a TVP less than 0.5 psia, or conducted by floating the oil pad off by restricting the outflow of water, such that 90% of the vessel volume is displaced; or 3) depressurize vessel to the on-site flare until the vessel reaches atmospheric pressure. [District Rule 2080] Federally Enforceable Through Title V Permit
- 21. Upon reintroducing crude oil/water to the vessel, the vapor control system shall be reactivated and pressure relief valves closed. [District Rule 2080] Federally Enforceable Through Title V Permit
- 22. Within 48 hours after refilling the vessel with crude oil/water, the pressure relief valves that discharge to atmosphere and hatch seals shall be inspected for leaks using EPA Method 21 and the regular maintenance and inspection program shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
- 23. While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 °F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 2201] Federally Enforceable Through Title V Permit
- 24. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 2201] Federally Enforceable Through Title V Permit
- 25. If this tank was holding organic liquids with a TVP of 1.5 psia or greater then during sludge removal, the operator shall control emissions from the sludge receiving vessel by operating an APCO-approved vapor control device that reduces emissions of organic vapors by at least 95%. [District Rule 2201] Federally Enforceable Through Title V Permit
- 26. If this tank was holding organic liquids with a TVP of 1.5 psia or greater then the operator shall only transport removed sludge in closed, liquid leak-free containers. [District Rule 2201] Federally Enforceable Through Title V Permit
- 27. If this tank was holding organic liquids with a TVP of 1.5 psia or greater then the operator shall store removed sludge, until final disposal, in vapor leak-free containers, or in tanks complying with the vapor control requirements of District Rule 4623. Sludge that is to be used to manufacture roadmix, as defined in District Rule 2020, is not required to be stored in this manner. Roadmix manufacturing operations exempt pursuant to District Rule 2020 shall maintain documentation of their compliance with Rule 2020, and shall readily make said documentation available for District inspection upon request. [District Rules 2020 and 2201] Federally Enforceable Through Title V Permit
- 28. Permittee shall maintain records of each period of cleaning and maintenance when the vessel is disconnected or isolated from the vapor control system. Records shall include the date that cleaning was initiated, the date cleaning was completed, the procedure used to vent vapors prior to opening, and a description of internal and external repairs and maintenance performed. [District Rule 2080] Federally Enforceable Through Title V Permit
- 29. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit

# **AUTHORITY TO CONSTRUCT**

**PERMIT NO: S-1548-479-3** 

**LEGAL OWNER OR OPERATOR:** AERA ENERGY LLC

MAILING ADDRESS:

PO BOX 11164

BAKERSFIELD, CA 93389-1164

LOCATION:

LIGHT OIL WESTERN STATIONARY SOURCE

SECTION: NW20 TOWNSHIP: 28S RANGE: 21E

**EQUIPMENT DESCRIPTION:** 

MODIFICATION OF 26,000 GALLON (10 FT DIAMETER X 40 FT SHELL LENGTH) INDUCED STATIC FLOTATION CELL V-240C VENTED TO VAPOR CONTROL SYSTEM LISTED ON S-1548-144 (DEHY 20): ADD STANDARD VESSEL CLEANING CONDITIONS

#### CONDITIONS

- {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule | Federally Enforceable Through Title V Permit
- {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
- Tank gauging or sampling devices shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District NSR Rule] Federally Enforceable Through Title V Permit
- All piping valves and fittings shall be constructed and maintained in a gas tight condition, except during periods of vessel interior cleaning or inspection. 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. [District NSR Rule] Federally Enforceable Through Title V Permit
- Vessel is a pressure vessel as defined by District Rule 4623, Section 3.20. [District Rule 4623] Federally Enforceable Through Title V Permit
- When in service, vessel shall vent to vapor control system listed in S-1548-144, except during periods of vessel interior cleaning. [District NSR Rule] Federally Enforceable Through Title V Permit
- VOC emission rate from vapor control components associated with this emissions unit shall not exceed 30.0 7. lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
- Permittee shall maintain an accurate fugitive component count and resultant emissions calculated using emission factors from U.S. EPA Publication 453/R-95-017, or other District approved factors. [District NSR Rule Federally Enforceable Through Title V Permit
- Except for periods of vessel cleaning or inspection, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times and shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

- 10. All piping, fittings, and valves directly affixed to the tank or associated with the tank vapor recovery system shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 11. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 12. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 13. Emissions from components which have been tagged by the facility operator for repair within 15 calendar days or which have been repaired and are awaiting re-inspection shall not be in violation of this permit. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 14. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 15. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 16. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- This permit authorizes induced static flotation unit cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2080] Federally Enforceable Through Title V Permit
- 18. Vessel may be disconnected from vapor control system during District approved cleaning and maintenance procedures as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
- 19. Permittee shall notify the District Compliance Division at least 72 hours (notification period can be less if approved by District Compliance Division) before any vessel cleaning or maintenance which necessitates isolation from the vapor control system. [District Rule 2080] Federally Enforceable Through Title V Permit

- 20. Prior to opening the vessel for cleaning or maintenance, one of the following procedures must be followed:

   Prior to venting the vessel to the atmosphere, operate the vapor recovery system/vapor control device for at least 24 hours such that it collects the vapors; or 2) use liquid displacement, conducted using a liquid with a TVP less than 0.5 psia, or conducted by floating the oil pad off by restricting the outflow of water, such that 90% of the vessel volume is displaced; or 3) depressurize vessel to the on-site flare until the vessel reaches atmospheric pressure. [District Rule 2080] Federally Enforceable Through Title V Permit
- 21. Upon reintroducing crude oil/water to the vessel, the vapor control system shall be reactivated and pressure relief valves closed. [District Rule 2080] Federally Enforceable Through Title V Permit
- 22. Within 48 hours after refilling the vessel with crude oil/water, the pressure relief valves that discharge to atmosphere and hatch seals shall be inspected for leaks using EPA Method 21 and the regular maintenance and inspection program shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
- 23. While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 °F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 2201] Federally Enforceable Through Title V Permit
- 24. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 2201] Federally Enforceable Through Title V Permit
- 25. If this tank was holding organic liquids with a TVP of 1.5 psia or greater then during sludge removal, the operator shall control emissions from the sludge receiving vessel by operating an APCO-approved vapor control device that reduces emissions of organic vapors by at least 95%. [District Rule 2201] Federally Enforceable Through Title V Permit
- 26. If this tank was holding organic liquids with a TVP of 1.5 psia or greater then the operator shall only transport removed sludge in closed, liquid leak-free containers. [District Rule 2201] Federally Enforceable Through Title V Permit
- 27. If this tank was holding organic liquids with a TVP of 1.5 psia or greater then the operator shall store removed sludge, until final disposal, in vapor leak-free containers, or in tanks complying with the vapor control requirements of District Rule 4623. Sludge that is to be used to manufacture roadmix, as defined in District Rule 2020, is not required to be stored in this manner. Roadmix manufacturing operations exempt pursuant to District Rule 2020 shall maintain documentation of their compliance with Rule 2020, and shall readily make said documentation available for District inspection upon request. [District Rules 2020 and 2201] Federally Enforceable Through Title V Permit
- 28. Permittee shall maintain records of each period of cleaning and maintenance when the vessel is disconnected or isolated from the vapor control system. Records shall include the date that cleaning was initiated, the date cleaning was completed, the procedure used to vent vapors prior to opening, and a description of internal and external repairs and maintenance performed. [District Rule 2080] Federally Enforceable Through Title V Permit
- 29. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit

# AUTHORITY TO CONSTRUCT

**PERMIT NO: S-1548-480-3** 

LEGAL OWNER OR OPERATOR: AERA ENERGY LLC

MAILING ADDRESS:

PO BOX 11164

**BAKERSFIELD, CA 93389-1164** 

LOCATION:

LIGHT OIL WESTERN STATIONARY SOURCE

CA

SECTION: NW20 TOWNSHIP: 28S RANGE: 21E

**EQUIPMENT DESCRIPTION:** 

MODIFICATION OF 26,000 GALLON (10 FT DIAMETER X 40 FT SHELL LENGTH) INDUCED STATIC FLOTATION CELL V-240D VENTED TO VAPOR CONTROL SYSTEM LISTED ON S-1548-144 (DEHY 20): ADD STANDARD VESSEL CLEANING CONDITIONS

#### CONDITIONS

- {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule Federally Enforceable Through Title V Permit
- {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
- 3. Tank gauging or sampling devices shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District NSR Rule] Federally Enforceable Through Title V Permit
- All piping valves and fittings shall be constructed and maintained in a gas tight condition, except during periods of vessel interior cleaning or inspection. 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. [District NSR Rule] Federally Enforceable Through Title V Permit
- Vessel is a pressure vessel as defined by District Rule 4623, Section 3.20. [District Rule 4623] Federally Enforceable Through Title V Permit
- When in service, vessel shall vent to vapor control system listed in S-1548-144, except during periods of vessel interior cleaning. [District NSR Rule] Federally Enforceable Through Title V Permit
- VOC emission rate from vapor control components associated with this emissions unit shall not exceed 30.0 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
- Permittee shall maintain an accurate fugitive component count and resultant emissions calculated using emission factors from U.S. EPA Publication 453/R-95-017, or other District approved factors. [District NSR Rule] Federally Enforceable Through Title V Permit
- Except for periods of vessel cleaning or inspection, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times and shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting, [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

- 10. All piping, fittings, and valves directly affixed to the tank or associated with the tank vapor recovery system shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 11. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 12. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 13. Emissions from components which have been tagged by the facility operator for repair within 15 calendar days or which have been repaired and are awaiting re-inspection shall not be in violation of this permit. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 14. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 15. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 16. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 17. This permit authorizes induced static flotation unit cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2080] Federally Enforceable Through Title V Permit
- 18. Vessel may be disconnected from vapor control system during District approved cleaning and maintenance procedures as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
- 19. Permittee shall notify the District Compliance Division at least 72 hours (notification period can be less if approved by District Compliance Division) before any vessel cleaning or maintenance which necessitates isolation from the vapor control system. [District Rule 2080] Federally Enforceable Through Title V Permit

- 20. Prior to opening the vessel for cleaning or maintenance, one of the following procedures must be followed:

   Prior to venting the vessel to the atmosphere, operate the vapor recovery system/vapor control device for at least 24 hours such that it collects the vapors; or 2) use liquid displacement, conducted using a liquid with a TVP less than 0.5 psia, or conducted by floating the oil pad off by restricting the outflow of water, such that 90% of the vessel volume is displaced; or 3) depressurize vessel to the on-site flare until the vessel reaches atmospheric pressure. [District Rule 2080] Federally Enforceable Through Title V Permit
- 21. Upon reintroducing crude oil/water to the vessel, the vapor control system shall be reactivated and pressure relief valves closed. [District Rule 2080] Federally Enforceable Through Title V Permit
- 22. Within 48 hours after refilling the vessel with crude oil/water, the pressure relief valves that discharge to atmosphere and hatch seals shall be inspected for leaks using EPA Method 21 and the regular maintenance and inspection program shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
- 23. While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 °F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 2201] Federally Enforceable Through Title V Permit
- 24. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 2201] Federally Enforceable Through Title V Permit
- 25. If this tank was holding organic liquids with a TVP of 1.5 psia or greater then during sludge removal, the operator shall control emissions from the sludge receiving vessel by operating an APCO-approved vapor control device that reduces emissions of organic vapors by at least 95%. [District Rule 2201] Federally Enforceable Through Title V Permit
- 26. If this tank was holding organic liquids with a TVP of 1.5 psia or greater then the operator shall only transport removed sludge in closed, liquid leak-free containers. [District Rule 2201] Federally Enforceable Through Title V Permit
- 27. If this tank was holding organic liquids with a TVP of 1.5 psia or greater then the operator shall store removed sludge, until final disposal, in vapor leak-free containers, or in tanks complying with the vapor control requirements of District Rule 4623. Sludge that is to be used to manufacture roadmix, as defined in District Rule 2020, is not required to be stored in this manner. Roadmix manufacturing operations exempt pursuant to District Rule 2020 shall maintain documentation of their compliance with Rule 2020, and shall readily make said documentation available for District inspection upon request. [District Rules 2020 and 2201] Federally Enforceable Through Title V Permit
- 28. Permittee shall maintain records of each period of cleaning and maintenance when the vessel is disconnected or isolated from the vapor control system. Records shall include the date that cleaning was initiated, the date cleaning was completed, the procedure used to vent vapors prior to opening, and a description of internal and external repairs and maintenance performed. [District Rule 2080] Federally Enforceable Through Title V Permit
- 29. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit

# **AUTHORITY TO CONSTRUCT**

PERMIT NO: S-1548-481-3

**LEGAL OWNER OR OPERATOR:** AERA ENERGY LLC

**MAILING ADDRESS:** 

PO BOX 11164

BAKERSFIELD, CA 93389-1164

LOCATION:

LIGHT OIL WESTERN STATIONARY SOURCE

CA

SECTION: NW20 TOWNSHIP: 28S RANGE: 21E

**EQUIPMENT DESCRIPTION:** 

MODIFICATION OF 26,000 GALLON (10 FT DIAMETER X 40 FT SHELL LENGTH) INDUCED STATIC FLOTATION CELL V-240E VENTED TO VAPOR CONTROL SYSTEM LISTED ON S-1548-144 (DEHY 20): ADD STANDARD VESSEL CLEANING CONDITIONS

#### CONDITIONS

- {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
- {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
- Tank gauging or sampling devices shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District NSR Rule] Federally Enforceable Through Title V Permit
- All piping valves and fittings shall be constructed and maintained in a gas tight condition, except during periods of vessel interior cleaning or inspection. 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 ppmy, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. [District NSR Rule] Federally Enforceable Through Title V Permit
- 5. Vessel is a pressure vessel as defined by District Rule 4623, Section 3.20. [District Rule 4623] Federally Enforceable Through Title V Permit
- 6. When in service, vessel shall vent to vapor control system listed in S-1548-144, except during periods of vessel interior cleaning. [District NSR Rule] Federally Enforceable Through Title V Permit
- 7. VOC emission rate from vapor control components associated with this emissions unit shall not exceed 30.0 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
- Permittee shall maintain an accurate fugitive component count and resultant emissions calculated using emission factors from U.S. EPA Publication 453/R-95-017, or other District approved factors. [District NSR Rule] Federally Enforceable Through Title V Permit
- Except for periods of vessel cleaning or inspection, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times and shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

- 10. All piping, fittings, and valves directly affixed to the tank or associated with the tank vapor recovery system shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. If any of the tank components are found to leak during an annual inspection, the inspection frequency for that component type shall be changed from annual to quarterly. If no tank components are subsequently found to be leaking during five consecutive inspections, the inspection frequency may be changed from quarterly to annual. Components located in inaccessible (over 15 feet above ground when access is required from the ground or over 6 feet away from a platform when access is required from the platform) locations shall be inspected at least annually and components located in unsafe areas shall be inspected and repaired at the next process unit turnaround (the scheduled shutdown of a unit for maintenance and repair work). [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 11. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this rule. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 12. An operator shall reinspect a component for leaks within thirty working days after the date on which the component is repaired. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 13. Emissions from components which have been tagged by the facility operator for repair within 15 calendar days or which have been repaired and are awaiting re-inspection shall not be in violation of this permit.

  [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 14. Any component leak shall be repaired to a leak-free condition or vented to a flare satisfying the requirements of 40 CFR 60.18 or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates that necessary and sufficient actions are being taken to correct the leak within this time period. Any vapor control device, other than a flare, used to comply with this condition shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 15. If the leaking component is an essential part of a critical process unit which cannot be immediately shut down for repairs, the operator shall 1) Minimize the leak within 15 calendar days; and 2) If the leak which has been minimized still exceeds the concentration allowed by this permit, the essential component shall be repaired to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection. A critical process unit is any process unit which would result in the automatic shutdown of other process units if it were shut down. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 16. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired; 4) Identification and location of essential parts of critical process units found leaking that cannot be repaired until the next process unit turnaround; and 5) Method used to minimize the leak from essential parts of critical process units which cannot be repaired until the next process unit turnaround. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 17. This permit authorizes induced static flotation unit cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2080] Federally Enforceable Through Title V Permit
- 18. Vessel may be disconnected from vapor control system during District approved cleaning and maintenance procedures as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
- 19. Permittee shall notify the District Compliance Division at least 72 hours (notification period can be less if approved by District Compliance Division) before any vessel cleaning or maintenance which necessitates isolation from the vapor control system. [District Rule 2080] Federally Enforceable Through Title V Permit

- 20. Prior to opening the vessel for cleaning or maintenance, one of the following procedures must be followed:

   Prior to venting the vessel to the atmosphere, operate the vapor recovery system/vapor control device for at least 24 hours such that it collects the vapors; or 2) use liquid displacement, conducted using a liquid with a TVP less than 0.5 psia, or conducted by floating the oil pad off by restricting the outflow of water, such that 90% of the vessel volume is displaced; or 3) depressurize vessel to the on-site flare until the vessel reaches atmospheric pressure. [District Rule 2080] Federally Enforceable Through Title V Permit
- 21. Upon reintroducing crude oil/water to the vessel, the vapor control system shall be reactivated and pressure relief valves closed. [District Rule 2080] Federally Enforceable Through Title V Permit
- 22. Within 48 hours after refilling the vessel with crude oil/water, the pressure relief valves that discharge to atmosphere and hatch seals shall be inspected for leaks using EPA Method 21 and the regular maintenance and inspection program shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
- 23. While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 °F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 2201] Federally Enforceable Through Title V Permit
- 24. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 2201] Federally Enforceable Through Title V Permit
- 25. If this tank was holding organic liquids with a TVP of 1.5 psia or greater then during sludge removal, the operator shall control emissions from the sludge receiving vessel by operating an APCO-approved vapor control device that reduces emissions of organic vapors by at least 95%. [District Rule 2201] Federally Enforceable Through Title V Permit
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