San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

MAR 18 2013

Mr. Phil Acosta
Vintage Production California
9600 Ming Avenue, Suite 300
Bakersfield, CA 93311

Re: Proposed ATC / Certificate of Conformity (Significant Mod)
District Facility # S-1738
Project # S1130181

Dear Mr. Acosta:

Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. The applicant is requesting that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. Vintage proposes to modify the requirements of a fixed roof 750 bbl crude oil tank connected to a vapor control system by estimate the tank's emissions using California Implementation Guidelines for Estimating Mass Emissions of fugitive Hydrocarbon Leaks at Petroleum Facilities, CAPCOA/CARB, February 1999 "revised screening" emissions factors in lieu of using stored liquid TVP and tank throughput.

After addressing any EPA comments made during the 45-day comment period, the Authority to Construct will be issued to the facility with a Certificate of Conformity. Prior to operating with modifications authorized by the Authority 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.

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

www.valleyair.org www.healthyairliving.com

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

Enclosures
c: Steve Davidson, Permit Services

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

MAR 18 2013

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-1738
Project # S1130181

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authority to Construct for Vintage Production California within the Light Oil Central stationary source, Kern county, which has been issued a Title V permit. Vintage Production California is requesting that a Certificate of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. Vintage proposes to modify the requirements of a fixed roof 750 bbl crude oil tank connected to a vapor control system by estimate the tank's emissions using California Implementation Guidelines for Estimating Mass Emissions of fugitive Hydrocarbon Leaks at Petroleum Facilities, CAPCOA/CARB, February 1999 "revised screening" emissions factors in lieu of using stored liquid TVP and tank throughput.

Enclosed is the engineering evaluation of this application with a copy of the current Title V permit and proposed Authority to Construct # S-1738-267-7 with Certificate 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) 392-5500.

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Sincerely,

David Warner
Director of Permit Services

Enclosures
c: Steve Davidson, Permit Services

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

MAR 18 2013

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-1738
Project # S1130181

Dear Mr. Tollstrup:

Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. The applicant is requesting that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. Vintage proposes to modify the requirements of a fixed roof 750 bbl crude oil tank connected to a vapor control system by estimate the tank's emissions using California Implementation Guidelines for Estimating Mass Emissions of fugitive Hydrocarbon Leaks at Petroleum Facilities, CAPCOA/CARB, February 1999 "revised screening" emissions factors in lieu of using stored liquid TVP and tank throughput.

Enclosed is the engineering evaluation of this application with a copy of the current Title V permit and proposed Authority to Construct # S-1738-267-7 with Certificate 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 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.

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Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

Enclosures
c: Steve Davidson, Permit Services

Bakersfield Californian

**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 significant modification of Vintage Production California for its light oil facility within the Light Oil Central stationary source, Kern county, California. Vintage proposes to modify the requirements of a fixed roof 750 bbl crude oil tank connected to a vapor control system by estimate the tank's emissions using California Implementation Guidelines for Estimating Mass Emissions of fugitive Hydrocarbon Leaks at Petroleum Facilities, CAPCOA/CARB, February 1999 "revised screening" emissions factors in lieu of using stored liquid TVP and tank throughput.

The District's analysis of the legal and factual basis for this proposed action, project #S1130181, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. There are no emission increases associated with this proposed action.

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. Leonard Scandura, Permit Services Manager, at (661) 392-5500. Written comments on the proposed initial permit must be submitted by April 23, 2013 to DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 34946 FLYOVER COURT, BAKERSFIELD, CA 93312.

Authority to Construct
Application Review

Fixed Roof Oil Field Production Tank < 5000 BBLs
Uncontrolled Emissions Less than 6 tons/year
Heavy Oil, Connected to Vapor Control,
Not subject to NSPS

Vintage Name:	Vintage Production California	Date:	March 1, 2013
Mailing Address:	9600 Ming Avenue, Suite 300 Bakersfield, CA 93311	Engineer: Lead Engineer:	Steve Davidson Rich Karrs
Contact Person:	Phil Acosta		
Telephone:	(661) 912-5854		
Application #(s):	S-1738-267-7		
Project #:	S-1130181		
Deemed Complete:	February 15, 2013		

RWK
3/6/13

I. Proposal

Vintage Production is applying for an Authority to Construct (ATC) permit to modify a fixed roof 750 bbl crude oil tank connected to the vapor control system listed on permit S-1738-22 by calculating emission using California Implementation Guidelines for Estimating Mass Emissions of fugitive Hydrocarbon Leaks at Petroleum Facilities, CAPCOA/CARB, February 1999 "revised screening" emissions factors.

The request includes removal of permit conditions limiting the true vapor pressure (TVP) and throughput limitations. These permit conditions are not necessary as the tanks are connected to a vapor control system. The tank permitted emissions will also be recalculated in accordance with District policy APR 1110, Use of Revised Generally Accepted Emission Factors. The revised emissions will be based on the number and type of components installed and recognized fugitive emission factors. No increase in permitted emissions is expected from this project.

The proposed modifications do not include any change in the method of operation, permitted emissions or change in condition to obtain an exemption from an applicable requirement (see Compliance Section). Therefore, this permitting action is not a New Source Review (NSR) modification and BACT, offsets, and public notice are not required.

Since this source is not included in the 28 specific source categories specified in 40 CFR 51.165, the increases in fugitive emissions are not included in calculating emissions for a Federal major Source. All the emissions associated

with this project are fugitive; therefore, this project is not a SB 288 Major Modification, a Federal major Modification, or a Rule 2410 Major Modification.

Vintage Production has a Title V Permit. This project requires a Title V significant permit modification pursuant to Rule 2520 (as the existing TVP and throughput recordkeeping requirements will be removed), and will be processed with a Certificate of Conformity (COC). Since the facility has requested that this project be processed with a COC, the 30-day public noticing period and 45-day EPA noticing periods will be satisfied prior to the issuance of the ATC. Prior to operating under the ATC, the facility must apply to administratively amend their Title V permit..

II. Applicable Rules

Rule 2201 New and Modified Stationary Source Review Rule (9/21/11)
Rule 2520 Federally Mandated Operating Permits (6/21/01)
Rule 2410 Prevention of Significant Deterioration (Adopted 6/16/11, effective 11/26/12)
Rule 4001 New Source Performance Standards,

Subpart Kb (Amended 4/14/99) - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) Is not applicable. This subpart does not apply to vessels with a design capacity ≤ 1,589.874 m^3 (≤ 420,000 gallons) used for petroleum or condensate stored, processed, or treated prior to custody transfer. The capacity of these tanks is ≤ 420,000 gallons, and they store crude oil prior to custody transfer; therefore, this subpart does not apply to the tanks in this project.

Subpart OOOO (Adopted 8/16/2012) - Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution.

Rule 4101 Visible Emissions (04/20/05)
Rule 4102 Nuisance (12/17/92)
Rule 4623 Storage of Organic Liquids (05/19/05)
CH&SC 41700 Health Risk Assessment
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 at the Pleito Ranch Field (SE/4 Section 25, Township 11N, Range 21W) within the Light Oil Western stationary source. The site is not located within 1,000 feet of the outer boundary of any K-12 school, Therefore, pursuant to CH&SC 42301.6, California Health and Safety Code (School Notice), public notification is not required.

IV. Process Description

The tanks and vessels at the tank battery receive production prior to custody transfer. The tank in this project operates as a storage tank.

VOC emissions from the tanks are controlled by a shared vapor control system in accordance with tank S-1738-22 permit conditions. The vapor control system collects vapors from the tanks and routes the uncondensed vapors a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight.

V. Equipment Listing

Pre-Project Equipment Description:

S-1738-267-6: 31,500 GALLON FIXED ROOF PETROLEUM STORAGE TANK WITH PIPING TO VAPOR RECOVERY SYSTEM UNDER PERMIT S-1738-22

Proposed Modification:

Delete TVP and throughput limits and revise tank emissions using generally accepted fugitive emissions factors

S-1738-267-7: MODIFICATION OF 750 BBL FIXED ROOF PETROLEUM STORAGE TANK VENTED TO VAPOR RECOVERY SYSTEM LISTED ON PERMIT S-1738-22: DELETE TVP AND THROUGHPUT LIMITS AND REVISE TANK EMISSIONS USING GENERALLY ACCEPTED FUGITIVE EMISSIONS FACTORS

Post Project Equipment Description:

S-1738-267-7: 750 BBL FIXED ROOF PETROLEUM STORAGE TANK VENTED TO VAPOR RECOVERY SYSTEM LISTED ON PERMIT S-1738-22

VI. Emission Control Technology Evaluation

The tank vapor control system collects vapors from the tanks, removes entrained liquid in knockout vessels and scrubber vessels, condenses gases in heat exchangers and routes the uncondensed vapors to a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight

VII. General Calculations

A. Assumptions

Neither the deletion of the storage temperature and RVP limits nor the substitution of fugitive emissions factors is an NSR modification. As such, general emissions calculations are not required.

Fugitive emissions will be recalculated using the revised emissions factors and the component roster supplied by the applicant based on the following assumptions:

- The facility operates 24 hours per day, 7 days per week, and 52 weeks per year
- There is no increase in permitted emissions for both units on this project
- VOC content of hydrocarbon is 100%
- Only components in gas and light oil service were counted
- Pre and post-project emissions are based on fugitive emissions

B. Emission Factors (EF)

The fugitive emissions for all tanks are calculated using California Implementation Guidelines for Estimating Mass Emissions of fugitive Hydrocarbon Leaks at Petroleum Facilities, CAPCOA/CARB, February 1999 "revised screening" emissions factors, included in Appendix B.

C. Calculations

1. Project Potential to Emit (PE)

As indicated above, the Potential to Emit VOCs are recalculated using revised emission factors pursuant to District Policy APR 1110. Therefore, the pre-project potential to emit is equal to the post-project potential to emit (PE1=PE2).

Fugitive VOC Emissions:

The updated calculations (spreadsheets) are included in Appendix B and summarized in the table below.

Permit Unit	lb-VOC/day	lb-VOC/yr
S-1738-267-7	0.2	73

Greenhouse Gas Emissions:

Since there is no increase in fugitive VOC emissions, it can be concluded that no increase in greenhouse gas emissions is also expected from this project.

2. Major Source Determination

Rule 2201 Major Source Determination:

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following shall not be included:

- any ERCs associated with the stationary source
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the Vintage for less than 12 months)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165

This source concedes that it is an existing Major Source for VOC emissions and will remain a Major Source for VOC. No change in other pollutants are proposed or expected as a result of this project.

Rule 2410 Major Source Determination:

Since this source is not included in the 28 specific source categories specified in 40 CFR 51.165, the increases in fugitive emissions are not included in the Rule 2410 Major Source Determination. All post project emissions associated with this project are fugitive emissions; therefore, a Rule 2410 Major source determination is not required.

3. SB 288 Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

Since this source is not included in the 28 specific source categories specified in 40 CFR 51.165, the, increases in fugitive emissions are not included in the SB 288 Major Modification calculation.

4. Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

Since this source is not included in the 28 specific source categories specified in 40 CFR 51.165, the increases in fugitive emissions are not included in the Federal Major Modification determination.

5. Rule 2410 – Prevention of Significant Deterioration (PSD) Applicability Determination

Since this source is not included in the 28 specific source categories specified in 40 CFR 51.165, the increases in fugitive emissions are not included in the Rule 2410 Prevention of Significant Deterioration (PSD) Applicability determination. All post project emissions associated with this project are fugitive emissions; therefore, a Rule 2410 Prevention of Significant Deterioration (PSD) Applicability determination is not required.

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

The changes being approved in this project are not NSR modifications. An NSR is an action that includes at least one of the following items, as defined in Section 3.25 of the rule:

- 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.
- 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.

- 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.
- Addition of any new emissions unit which is subject to District permitting requirements.
- 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 tank is currently connected to a vapor control system; therefore, limiting the TVP and throughput is not necessary pursuant to District Rule 4623. Removal of these limits does not result in an emissions increase or a change in permit term or condition to exempt an applicant from an applicable requirement, and therefore is not considered an NSR modification.

In addition, in accordance with District policy APR 1110, the substitution of a revised generally accepted emissions factor for an outdated emissions factor is an administrative action and does not have NSR implications.

Rule 2410 Prevention of Significant Deterioration

Since this source is not included in the 28 specific source categories specified in 40 CFR 51.165, the increases in fugitive emissions are not included in the Rule 2410 Major Source Determination. All post project emissions associated with this project are fugitive emissions; therefore, Rule 2410 does not apply.

Rule 2520 Federally Mandated Operating Permits

Since this project results in a Title V significant permit modification, and the facility has applied for a COC, the 30-day public noticing period required by section 11.3.1 and the 45-day EPA noticing period will be satisfied prior to the issuance of the ATC. Therefore, the facility must apply to modify their Title V permit with an administrative amendment prior to operating with the proposed modifications.

Rule 4001 New Source Performance Standards

This rule incorporates the New Source Performance Standards from 40 CFR Part 60. 40 CFR Part 60, Subparts, K, Ka, Kb, and OOOO and could potentially apply to the storage tanks located at this Vintage.

40 CFR Part 60, Subparts, K, Ka, and Kb could potentially apply to the storage tanks located at this Vintage . However, pursuant to 40 CFR 60.110 (b), 60.110(a) (b), and 60.110(b) (b), these subparts do not apply to storage vessels less than 10,000 bbls, used for petroleum or condensate, that is stored,

processed, and/or treated at a drilling and production Vintage prior to custody transfer.

40 CFR Part 60, Subpart OOOO—Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution (constructed, reconstructed, or modified after 8/23/11) appliès to single storage vessel, located in the oil and natural gas production segment, natural gas processing segment or natural gas transmission and storage segment. The existing tank in this project is not being modified and has not been modified after August 23, 2011. Therefore, the subject tank is not an affected facility and subpart OOOO does not apply.

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.

As long as the equipment is properly maintained and operated, compliance with visible emissions limits is expected under normal operating conditions.

Rule 4102 - Public Nuisance

Rule 4102 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.

CH&SC 41700 - California Health and Safety Code

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 4623, *Storage of Organic Liquids*

This rule applies to any tank with a capacity of 1,100 gallons or greater in which any organic liquid is placed, held, or stored.

The affected tanks are served by a vapor control system that has a control efficiency of at least 95%. This rule also requires the tank and tank vapor control

system to be maintained in a leak-free condition. Leak-free is defined in the rule as no readings on a portable VOC detection device greater than 10,000 ppmv above background and no dripping of organic liquid at a rate of more than 3 drops per minute.

Compliance with the requirements of this rule is expected.

CH&SC 42301.6 California Health & Safety Code (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, 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.

The tank are equipped with a 95% efficient vapor controls satisfies the Best Performance Standards (BPS) for Front-line Organic Liquid Storage Tanks, Fixed Roof Tanks < 5,000 bbl. The District therefore concludes that the project would have a less than cumulatively significant impact on global climate change and no other discussion for green house gas emissions is required.

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 Vintage 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. Recommendations

The following conditions will be removed from the permit:

- True vapor pressure of liquids stored shall not exceed 3.5 psia. [District NSR Rule] Y
- Tank oil throughput shall not exceed 1300 bbl/day. [District NSR Rule] Y
- VOC emissions from unit shall not exceed 0.03 lb/hr. [District NSR Rule] Y
- Operator shall maintain records of daily tank throughput. [District Rule 2520, 9.3.2] Y

The following condition will be removed from the permit because this permit the control device is listed on permit S-1738-22:

- The control efficiency of any VOC destruction device, measured and calculated as carbon, shall be determined by US EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case US EPA Method 25a may be used. US EPA Method 18 may be used in lieu of US EPA Method 25 or US EPA Method 25A provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of the known analytes/compounds to ensure that the VOC concentrations are neither under- or over-reported. Analysis of halogenated exempt compounds shall be analyzed by ARB Method 422 "Exempt Halogenated VOCs in Gases September 12, 1990."

Add the following conditions to the ATC:

- VOC fugitive emissions from the components in gas and liquid service shall not exceed 0.2 lb/day. [District Rule 2201] N

- Permittee shall maintain accurate component count for tank according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201] N

Issue Authority to Construct S-1738-267-7 subject to the permit conditions on the attached draft Authority to Construct.

X. Billing Information

Permit Number	Fee Schedule	Fee Description	Annual Fee
S-1738-267-7	3020-5-C	750 BBLs	$135

ATTACHMENT A: Current Permits S-1738-267-7
ATTACHMENT B: Emissions Calculations
ATTACHMENT C: Compliance Certification Form
ATTACHMENT D: Emissions Profile(s)
ATTACHMENT E: Draft ATC(s)

ATTACHMENT A
Current Permits S-1738-267-6

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1738-267-6 **EXPIRATION DATE:** 02/28/2014

SECTION: 25 **TOWNSHIP:** 11N **RANGE:** 21W

EQUIPMENT DESCRIPTION:
31,500 GALLON FIXED ROOF PETROLEUM STORAGE TANK WITH PIPING TO VAPOR RECOVERY SYSTEM UNDER PERMIT S-1738-22

PERMIT UNIT REQUIREMENTS

1. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device the reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6. [District Rule 4623] Federally Enforceable Through Title V Permit
2. All piping valves and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623, 5.6.3] Federally Enforceable Through Title V Permit
3. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. A reading in excess of 10,000 ppmv above background or the dripping of organic liquid at a rate of more than 3 drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623, 3.11, 3.17, 3.18, and 6.4.8] Federally Enforceable Through Title V Permit
4. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623, 5.6.2] Federally Enforceable Through Title V Permit
5. The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. The operator of a fixed roof tank shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. Compliance with permit conditions in the Title V permit shall be deemed compliance with District Rule 4623 (Amended May 19, 2005). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
8. This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
9. Vapors shall vent only through gas line compressor. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

10. Storage tank p/v caps shall be set to relieve pressure at a pressure level higher than that required to actuate compressor. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Storage tank p/v caps shall be gas tight as defined in Rule 4623 (except for inbreathing) during normal operation. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Vapor control compressor shall activate when tank internal pressure exceeds 2 inch w.c. and shall shut down when tank internal pressure falls to 0.5 inch w.c. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Makeup gas shall be introduced into tanks when tank pressure falls to 0.4 inch w.c. and shall be shut off at 0.5 inch w.c. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Liquids from knockout vessel shall be disposed of in a manner which prevents volatile organic compound emission to atmosphere. [District Rule 4101] Federally Enforceable Through Title V Permit
15. True vapor pressure of liquids stored shall not exceed 3.5 psia. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Tank oil throughput shall not exceed 1300 bbl/day. [District NSR Rule] Federally Enforceable Through Title V Permit
17. VOC emissions from unit shall not exceed 0.03 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit
19. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit
20. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit
21. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit
22. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit
23. If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit
24. Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

25. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

26. The control efficiency of any VOC destruction device, measured and calculated as carbon, shall be determined by US EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case US EPA Method 25a may be used. US EPA Method 18 may be used in lieu of US EPA Method 25 or US EPA Method 25A provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of the known analytes/compounds to ensure that the VOC concentrations are neither under- or over-reported. Analysis of halogenated exempt compounds shall be analyzed by ARB Method 422 "Exempt Halogenated VOCs in Gases September 12, 1990." [District Rule 4623, 6.4.6 and 6.4.7] Federally Enforceable Through Title V Permit

27. Operator shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

28. Operator shall inspect pressure relief valve for fugitive leaks annually in accordance with EPA Method 21, with the instrument calibrated with methane. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

29. Operator shall maintain records of daily tank throughput. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

ATTACHMENT B
Emissions Calculations

Vintage Production CA
S1738-267-7

Fugitive Emissions Using Screening Emission Factors

California Implementation Guidelines for Estimating Mass Emissions
of Fugitive Hydrocarbon Leaks at Petroleum Facilities
Table IV-2c. Oil and Gas Production
Screening Value Ranges Emission Factors

Percentage of components with ≥ 10,000 ppmv leaks allowed?	0 %
Weight percentage of VOC in the total organic compounds in gas (neglect non-organics)?	100 %
Weight percentage of VOC in the total organic compounds in oil (neglect non-organics)?	100 %

Equipment Type	Service	Component Count	Total allowable leaking components	Screening Value EF, TOC < 10,000 ppmv (lb/day/source)	Screening Value EF, TOC ≥ 10,000 ppmv (lb/day/source)	VOC emissions (lb/day)
Valves	Gas/Light Liquid	0	0	1.852E-03	7.333E+00	0.00
	Light Crude Oil	38	0	1.005E-03	3.741E+00	0.04
	Heavy Crude Oil	0	0	7.408E-04	N/A*	0.00
Pump Seals	Gas/Light Liquid	0	0	5.270E-02	4.709E+00	0.00
	Light Crude Oil	0	0	1.402E-02	4.709E+00	0.00
	Heavy Crude Oil	0	0	N/A	N/A	N/A
Others	Gas/Light Liquid	0	0	7.778E-03	7.281E+00	0.00
	Light Crude Oil	5	0	6.931E-03	3.757E-01	0.03
	Heavy Crude Oil	0	0	3.016E-03	N/A*	0.00
Connectors	Gas/Light Liquid	0	0	6.349E-04	1.370E+00	0.00
	Light Crude Oil	205	0	5.291E-04	1.238E+00	0.11
	Heavy Crude Oil	0	0	4.233E-04	4.233E-04	0.00
Flanges	Gas/Light Liquid	0	0	1.482E-03	3.228E+00	0.00
	Light Crude Oil	26	0	1.270E-03	1.376E+01	0.03
	Heavy Crude Oil	0	0	1.217E-03	N/A*	0.00
Open-ended Lines	Gas/Light Liquid	0	0	1.270E-03	2.905E+00	0.00
	Light Crude Oil	0	0	9.524E-04	1.175E+00	0.00
	Heavy Crude Oil	0	0	7.937E-04	3.762E+00	0.00

* Emission factor not available. All components from equipment type and service will be assessed as < 10,000 ppmv

Total VOC Emissions = 0.2 lb/day

ATTACHMENT C
Compliance Certification Form

San Joaquin Valley
Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

☒ SIGNIFICANT PERMIT MODIFICATION
☐ MINOR PERMIT MODIFICATION
☐ ADMINISTRATIVE AMENDMENT

COMPANY NAME: Vintage Production California LLC	FACILITY ID: S-1738
1. Type of Organization: ☒ Corporation ☐ Sole Ownership ☐ Government ☐ Partnership ☐ Utility	
2. Owner's Name: Vintage Production California LLC	
3. Agent to the Owner: Stephen Bartz	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

(SB) Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).

(SB) Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.

(SB) Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

(SB) Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

Signature of Responsible Official — Date: February 28, 2013

Stephen Bartz

Name of Responsible Official (please print)

Operations Team Lead (Central)

Title of Responsible Official (please print)

Convert Tanks S-1738-267 to fugitive component count & remove throughput-basis emission limit

Mailing Address: Central Regional Office * 1990 E. Gettysburg Avenue * Fresno, California 93726-0244 * (559) 230-5900 * FAX (559) 230-6061

ATTACHMENT D
Emissions Profile

Permit #: S-1738-267-7	**Last Updated**
Facility: VINTAGE PRODUCTION CALIFORNIA	03/01/2013 DAVIDSOS

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	73.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	18.0
Q2:	0.0	0.0	0.0	0.0	18.0
Q3:	0.0	0.0	0.0	0.0	18.0
Q4:	0.0	0.0	0.0	0.0	18.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

ATTACHMENT E
Draft ATC S-1738-267-7

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-1738-267-7 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: VINTAGE PRODUCTION CALIFORNIA LLC
MAILING ADDRESS: 9600 MING AVE, SUITE 300
BAKERSFIELD, CA 93311

LOCATION: LIGHT OIL WESTERN STATIONARY SOURCE
WESTERN KERN COUNTY
KERN COUNTY, CA

SECTION: 25 **TOWNSHIP:** 11N **RANGE:** 21W

EQUIPMENT DESCRIPTION:
MODIFICATION OF 750 BBL FIXED ROOF PETROLEUM STORAGE TANK VENTED TO VAPOR RECOVERY SYSTEM LISTED ON PERMIT S-1738-22: DELETE TVP AND THROUGHPUT LIMITS AND REVISE TANK EMISSIONS USING GENERALLY ACCEPTED FUGITIVE EMISSIONS FACTORS

CONDITIONS

1. {1829} The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device the reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6. [District Rule 4623] Federally Enforceable Through Title V Permit
3. All piping valves and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623, 5.6.3] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

DRAFT

DAVID WARNER, Director of Permit Services
S-1738-267-7 : Mar 6 2013 7:38AM -- DAVIDSOS : Joint Inspection NOT Required

4. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. A reading in excess of 10,000 ppmv above background or the dripping of organic liquid at a rate of more than 3 drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623, 3.11, 3.17, 3.18, and 6.4.8] Federally Enforceable Through Title V Permit
5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623, 5.6.2] Federally Enforceable Through Title V Permit
6. {2606} The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
7. {2591} The operator of a fixed roof tank shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
8. Compliance with permit conditions in the Title V permit shall be deemed compliance with District Rule 4623 (Amended May 19, 2005). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
9. {2608} This unit has a storage capacity less than 420,000 gallons and is used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer. Therefore, the requirements of 40CFR 60 Subpart K, Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
10. Vapors shall vent only through gas line compressor. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Storage tank p/v caps shall be set to relieve pressure at a pressure level higher than that required to actuate compressor. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Storage tank p/v caps shall be gas tight as defined in Rule 4623 (except for inbreathing) during normal operation. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Vapor control compressor shall activate when tank internal pressure exceeds 2 inch w.c. and shall shut down when tank internal pressure falls to 0.5 inch w.c. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Makeup gas shall be introduced into tanks when tank pressure falls to 0.4 inch w.c. and shall be shut off at 0.5 inch w.c. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Liquids from knockout vessel shall be disposed of in a manner which prevents volatile organic compound emission to atmosphere. [District Rule 4101] Federally Enforceable Through Title V Permit
16. VOC fugitive emissions from the components in gas and liquid service shall not exceed 0.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit
18. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit

20. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit

21. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit

22. If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit

23. Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rule 4623 (Table 3)] Federally Enforceable Through Title V Permit

24. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

25. Operator shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

26. Operator shall inspect pressure relief valve for fugitive leaks annually in accordance with EPA Method 21, with the instrument calibrated with methane. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

27. Permittee shall maintain accurate component count for tank according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-2c (Feb 1999), Screening Value Range emission factors < 10,000 ppmv. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Federally Enforceable Through Title V Permit