



**SEP 21 2016**

Mr. Wm. Doug Shaffer  
California Resources Production Corp  
11109 River Run Blvd  
Bakersfield, CA 93311

**Re: Notice of Preliminary Decision – Title V Permit Renewal  
District Facility # S-8453  
Project # 1162976**

Dear Mr. Shaffer:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for California Resources Production Corp within western Kern County, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the renewed Federally Mandated Operating Permit. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

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

Sincerely,

Arnaud Marjollet  
Director of Permit Services

Enclosures

cc: Tung Le, CARB (w/enclosure) via email  
cc: Gerardo C. Rios, EPA (w/enclosure) via email

**Seyed Sadredin**

Executive Director/Air Pollution Control Officer

**Northern Region**

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# SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

Proposed Title V Permit Renewal Evaluation  
California Resources Production Corp  
S-8453

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**TITLE V PERMIT RENEWAL EVALUATION**  
**Heavy Oil Production Operation**

**Engineer:** Richard Edgehill  
**Date:** August 18, 2016

**Facility Number:** S-8453  
**Facility Name:** California Resources Production Corp  
**Mailing Address:** 11109 River Run Blvd  
Bakersfield, CA 93311

**Contact Name:** Wm. Doug Shaffer  
**Phone:** (661) 529-4366

**Responsible Official:** Jim Robinson  
**Title:** VP Health, Safety, and Environment

**Project # :** S-1162976  
**Deemed Complete:** August 18, 2016

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**I. PROPOSAL**

California Resources Production Corp was issued a Title V permit which was renewed on December 31, 2012. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the renewed Title V permit (December 31, 2012).

The purpose of this evaluation is to provide the legal and factual basis for all updated applicable requirements and to determine if the facility will comply with these updated requirements. It also specifically identifies all additions, deletions, and/or changes made to permit conditions or equipment descriptions.

**II. FACILITY LOCATION**

California Resources Production Corp is located at the heavy oil western stationary source in Kern County, CA.

### III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is included as Attachment A.

### IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is requesting to use the following model general permit Templates:

#### A. Template SJV-UM-0-3 Facility Wide Umbrella

The facility wide permit includes the conditions on template No. SJV-UM-0-3, Facility Wide Umbrella in addition to the following specific condition:

41. *No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] N*
42. *Facilities S-1327, S-6848 and S-8453 are part of the same heavy oil western stationary source. [District Rule 2201] Y*
43. *On December 31, 2012, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule] N*

### V. SCOPE OF EPA AND PUBLIC REVIEW

Certain segments of the proposed Renewed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

The following permit conditions, including their underlying applicable requirements, originate from model general permit templates and are not subject to further EPA or public review.

Conditions 1 through 40 of the requirements for permit unit S-8453-0-2.

The applicant is not requesting any other model general permit templates. Therefore, all federally enforceable conditions in this current Title V permit will be subject to EPA and public review.

## VI. FEDERALLY ENFORCEABLE REQUIREMENTS

### A. Rules Updated

- District Rule 2020, Exemptions (amended December 18, 2014)
- District Rule 2201, New and Modified Stationary Source Review Rule (amended February 18, 2016)
- District Rule 4702, Internal Combustion Engines – Phase 2 (Amended November 14, 2013)
- 40 CFR Part 82, Subpart B Stratospheric Ozone (June 25, 2013)
- 40 CFR Part 82, Subpart F Stratospheric Ozone (June 25, 2013)

### B. Rules Removed

None

### C. Rules Added

Following rules are that are applicable to operation of this facility has been adopted since issuance of the initial Title V permit.

- District Rule 2410, Prevention of Significant Deterioration (adopted June 16, 2011, effective November 26, 2012)

### D. Rules Not Updated

- District Rule 1070 Inspections (Amended December 17, 1992)
- District Rule 1080, Stack Monitoring (amended December 17, 1992)
- District Rule 1081, Source Sampling (amended December 16, 1993)
- District Rule 1100, Equipment Breakdown (amended December 17, 1992)
- District Rule 1160, Emission Statements (adopted November 18, 1992)
- District Rule 2010, Permits Required (amended December 17, 1992)

- District Rule 2031, Transfer of Permits (amended December 17, 1992)
- District Rule 2040, Applications (amended December 17, 1992)
- District Rule 2070, Standards for Granting Applications (amended December 17, 1992)
- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 2520, Federally Mandated Operating Permits (amended June 21, 2001)
- District Rule 4002 National Emissions Standards for Hazardous Air Pollutants (Amended May 20, 2004)

40 CFR Subpart IIII –Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (RICE)

- District Rule 4101, Visible Emissions (amended February 17, 2005)
- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)
- District Rule 4311, Flares, (amended June 16, 2009)
- District Rule 4623, Storage of Organic Liquids (Amended 5/19/05)
- District Rule 4801, Sulfur Compounds (amended December 17, 1992)
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos
- 40 CFR Part 82, Subpart F, Stratospheric Ozone
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos (7/20/04)
  - 40 CFR Part 64, Compliance Assurance Monitoring (10/22/97)
- District Rule 4601 Architectural Coatings (Amended December 17, 2009)
- 40 CFR Part 60 Appendix F (7/1/91)
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos (7/20/04)
- 40 CFR Part 64, Compliance Assurance Monitoring (CAM)

## VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as "Federally Enforceable Through Title V Permit".

For this facility, the following are not federally enforceable and will not be discussed in further detail:

**A. Rules Added**

None

**B. Rules Not Updated**

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

Condition 41 of permit units -0-2 is based on District Rule 4102 and will therefore not be discussed any further.

**VIII. PERMIT REQUIREMENTS**

The purpose of this evaluation is to review changes to federally enforceable requirements; therefore, this compliance section will only address rules that have been amended or added since the issuance of the initial Title V permit or most recent renewal of the Title V permit.

**A. District Rule 2020 - Exemptions**

District Rule 2020 lists equipment which are specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions. The amendments to this rule do not have any effect on current permit requirements and will therefore not be addressed in this evaluation.

**B. District Rule 2201 - New and Modified Stationary Source Review Rule**

District Rule 2201 has been amended since this facility's initial Title V permit was issued. This Title V permit renewal does not constitute a modification per section 3.26, defined as an action including at least one of the following items:

- 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.
- 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) 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.
- 4) Addition of any new emissions unit which is subject to District permitting requirements.

- 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.

Therefore, the updated requirements of this rule are not applicable at this time.

**C. 40 CFR Part 64 – CAM**

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

- 1) the unit must have an emission limit for the pollutant;
- 2) the unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
- 3) the unit must have a pre-control potential to emit of greater than the major source thresholds.

**Major Source Thresholds**

Pollutant	lb/year	ton/year
NO <sub>x</sub>	20,000	10
SO <sub>x</sub>	140,000	70
PM <sub>10</sub>	140,000	70
CO	200,000	100
VOC	20,000	10

**S-8453-1**

This permit unit has emissions limits for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC but does not have add-on controls for these criteria pollutants. Therefore, this permit unit is not subject to CAM for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC.

**IX. PERMIT SHIELD**

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

Conditions 39 and 40 on the proposed permit S-8453-0-2 are permit shields for the facility.



**X. PERMIT CONDITIONS**

See Attachment A - Draft Renewed Title V Operating Permit.

**XI. ATTACHMENTS**

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

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# ATTACHMENT A

Draft Renewed Title V Operating Permit

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# San Joaquin Valley Air Pollution Control District

FACILITY: S-8453-0-2

EXPIRATION DATE: 02/28/2017

## FACILITY-WIDE REQUIREMENTS

1. {4362} The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. {4363} The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. {4364} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. {4365} Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. {4366} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. {4368} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. {4370} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: CALIFORNIA RESOURCES PRODUCTION CORP

Location: HEAVY OIL WESTERN

S-8453-0-2: Aug 22 2016 12:45PM -- EDGEHILL

10. {4371} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. {4372} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. {4373} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. {4374} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. {4375} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. {4376} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. {4377} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. {4378} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. {4379} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. {4380} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. {4381} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. {4382} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

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FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

22. {4383} No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
23. {4384} No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. {4385} All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. {4386} The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. {4387} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. {4388} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. {4389} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. {4390} Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8021 and 8011] Federally Enforceable Through Title V Permit
30. {4391} Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8031 and 8011] Federally Enforceable Through Title V Permit
31. {4392} An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8041 and 8011] Federally Enforceable Through Title V Permit
32. {4393} Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8051 and 8011] Federally Enforceable Through Title V Permit
33. {4394} Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8061 and 8011] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

34. {4395} Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8071 and 8011] Federally Enforceable Through Title V Permit
35. {4396} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
36. {4397} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. {4398} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. {4399} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. {4400} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. {4401} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. Facilities S-1327, S-6848 and S-8453 are part of the same heavy oil western stationary source. [District Rule 2201] Federally Enforceable Through Title V Permit
43. On December 31, 2012, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule]

DRAFT

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-8453-1-2

EXPIRATION DATE: 02/28/2017

SECTION: SW35 TOWNSHIP: 11N RANGE: 21W

## EQUIPMENT DESCRIPTION:

750 BBL FIXED ROOF CRUDE OIL WASH TANK T-750 WITH VAPOR CONTROL SYSTEM SHARED WITH S-8453-2, '-3, '-4 AND '-5 INCLUDING HEAT EXCHANGER, HEATER TREATER, COMPRESSOR(S), TWO COMPRESSORS DRIVEN BY PERMIT-EXEMPT IC ENGINES, AN H2S SCRUBBER AND A 21.6 MMBTU/HR SONIC FLARE (PLEITO CREEK LEASE)

## PERMIT UNIT REQUIREMENTS

1. Operation may include permit exempt heater treater and water heater which shall only be fired on LPG or natural gas containing no more than 1.0 gr S/100scf and no more than 5% by weight hydrocarbons heavier than butane. [District Rule 2020] Federally Enforceable Through Title V Permit
2. Collected sludge from water treatment facility shall be stored and handled in a manner that will not cause or allow evaporation of VOC to the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1/4 or 5% opacity. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Vapor control system shall serve S-8453-1, '-2, '-3, '-4, & '-5, and 76 bbl heater treater. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Maximum VOC content of hydrocarbons in the vapor handling components shall not exceed 65% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
6. VOC content shall be tested initially and annually thereafter using methods and procedures approved by the District. VOC sampling shall be conducted under circumstances representative of normal operation. VOC content shall be analyzed using the latest version of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be analyzed by CARB Method 422. [District Rule 1070]
7. There shall be no leaks in excess of 10,000 ppmv when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The tank and tank vapor recovery system, including all piping, valves, and fittings shall be maintained in a leak-free condition. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The tank shall be equipped with a fixed roof with no holes or openings. [District Rule 2201] Federally Enforceable Through Title V Permit
10. This tank shall only vent to a vapor control system. The vapor control system shall be an APCO-approved system consisting of a closed vent system that collects all VOCs from the storage tank and sends to a VOC control device. The vapor control system shall be maintained in a leak-free condition. The VOC control devices shall be a flare that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4 of District Rule 4623 and/or injection into DOGGR-approved disposal well. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. A leak-free condition is 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 that is calibrated with methane 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 gas leak or a liquid leak is a violation of this permit and Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
12. Any tank gauging or sampling device on a tank vented to the vapor control system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
13. All piping, fittings, and valves on this tank 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 leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
14. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
15. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) eliminate or minimize the leak within 8 hours after detection, (b) if the leak can not 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 the leak exceed 56 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
16. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of the District Rule 4623. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of SJVUAPCD Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
17. If a component type is found to leak during an annual inspection, then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, then revert to annual inspections. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
18. Any component affixed to the tank or within 5 feet of the tank that is found to be leaking on two consecutive annual inspections is in violation of SJVUAPCD Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
19. 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 1070]
20. Fugitive VOC emissions rate shall be calculated using CAPCOA 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 (Feb 1999). [District Rule 2201] Federally Enforceable Through Title V Permit
21. VOC fugitive emissions from the components in gas service on the tank and vapor control system piping shall not exceed 1.3 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Uncondensed vapors shall be incinerated in the flare and/or injected into DOGGR-approved disposal well. [District Rule 2201] Federally Enforceable Through Title V Permit
23. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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



24. Permittee shall keep in their facility at all times a copy of the letter sent to the APCO requesting participation in the Rule 4623 Fixed Roof Tank Preventive Inspection and Maintenance Program, and Tank Interior Cleaning Program, and maintain the records of annual tank inspections, maintenance, and cleaning to document the participation in the program. [District Rule 4623] Federally Enforceable Through Title V Permit
25. Permittee shall comply with all applicable Tank Interior Cleaning Program requirements specified in Section 5.7 of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
26. Flare shall be equipped with waste gas volume flow metering system. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Flare outlet shall be equipped with an automatic ignition system, or, shall operate with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rule 4311] Federally Enforceable Through Title V Permit
28. Maximum amount of waste gas combusted shall not exceed 21.458 MMBtu/hour. [District Rule 2201] Federally Enforceable Through Title V Permit
29. Measured heating value and quantity of gas flared shall be used to determine compliance with heat input limits. [District Rule 2201] Federally Enforceable Through Title V Permit
30. Sulfur content of produced flared gas shall not exceed 1.0 gr/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
31. Flare emissions shall not exceed any of the following: 0.068 lb-NOx/MMBtu, 0.008 lb-PM10/MMBtu, 0.370 lb-CO/MMBtu, or 0.063 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
32. Operator shall conduct quarterly sampling of the sulfur content of the gas flared. If 8 consecutive quarterly samplings show compliance, then sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
33. Permittee shall determine sulfur content of gas flared using ASTM method D3246 or double GC for H2S and mercaptans or Draeger tube analysis. Sulfur content of waste gas shall be measured within one day of restarting unit if the unit has not been in use for more than 7 days. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
34. Records of the waste gas sulfur content and daily records of waste gas flow rate shall be maintained, retained on the premises, and made available for District inspection on request. [District Rule 2201] Federally Enforceable Through Title V Permit
35. Permittee shall maintain a written record of the VOC content of the gas sampled. [District Rule 2201] Federally Enforceable Through Title V Permit
36. {3246} All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
37. Formerly S-3100-3. [District Rule]
38. Formerly S-1327-169. [District Rule]

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-8453-2-2

**EXPIRATION DATE:** 02/28/2017

**SECTION:** SW35 **TOWNSHIP:** 11N **RANGE:** 21W

**EQUIPMENT DESCRIPTION:**

500 BBL FIXED ROOF CRUDE OIL SHIPPING TANK T-130D SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-8453-1 (PLEITO CREEK LEASE)

## PERMIT UNIT REQUIREMENTS

1. Tank shall only vent to vapor control system listed on S-8453-1. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Maximum VOC content of hydrocarbons in the vapor handling components shall not exceed 65% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
3. VOC content shall be tested initially and annually thereafter using methods and procedures approved by the District. VOC sampling shall be conducted under circumstances representative of normal operation. VOC content shall be analyzed using the latest version of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be analyzed by CARB Method 422. [District Rule 1070]
4. Fugitive VOC emissions rate shall be calculated using CAPCOA 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 (Feb 1999). [District Rule 2201] Federally Enforceable Through Title V Permit
5. VOC fugitive emissions from the components in gas service on the tank and vapor control system piping shall not exceed 0.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Tank shall only vent to a vapor control system. The vapor control system shall be an APCO-approved system consisting of a closed vent system that collects all VOCs from the storage tank and a VOC control device. The vapor control system shall be maintained in a leak-free condition. The VOC control device shall be a flare that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.7 of District Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. 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 gas leak or a liquid leak is a violation of this permit and Rule 4623. [District Rules 2201 4623] Federally Enforceable Through Title V Permit
9. 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 Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. All piping, fittings, and valves on this tank 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 leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
12. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) eliminate or minimize the leak within 8 hours after detection, (b) if the leak can not 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 the leak exceed 56 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
13. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of the District Rule 4623. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of SJVUAPCD Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
14. If a component type is found to leak during an annual inspection, then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, then revert to annual inspections. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
15. Any component affixed to the tank or within 5 feet of the tank that is found to be leaking on two consecutive annual inspections is in violation of SJVUAPCD Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
16. 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 1070]
17. Permittee shall maintain a written record of the VOC content of the gas sampled. [District Rule 2201] Federally Enforceable Through Title V Permit
18. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020] Federally Enforceable Through Title V Permit
19. Permittee shall keep in their facility at all times a copy of the letter sent to the APCO requesting participation in the Rule 4623 Fixed Roof Tank Preventive Inspection and Maintenance Program, and Tank Interior Cleaning Program, and maintain the records of annual tank inspections, maintenance, and cleaning to document the participation in the program. [District Rule 4623] Federally Enforceable Through Title V Permit
20. Permittee shall comply with all applicable Tank Interior Cleaning Program requirements specified in Section 5.7 of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
21. {3246} All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
22. Formerly S-3100-4. [District Rule]
23. Formerly S-1327-170. [District Rule]

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-8453-3-2

**EXPIRATION DATE:** 02/28/2017

**SECTION:** SW35 **TOWNSHIP:** 11N **RANGE:** 21W

**EQUIPMENT DESCRIPTION:**

1,000 BBL FIXED CONE ROOF CRUDE OIL PRODUCTION/SHIPPING TANK T-130A (21 .5 FT X 16 FT) CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON PERMIT UNIT S-8453-1 (PLEITO CREEK LEASE)

## PERMIT UNIT REQUIREMENTS

1. Tank shall vent only to vapor control system listed on S-8453-1. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Maximum VOC content of hydrocarbons in the vapor handling components shall not exceed 65% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
3. VOC content shall be tested initially and annually thereafter using methods and procedures approved by the District. VOC sampling shall be conducted under circumstances representative of normal operation. VOC content shall be analyzed using the latest version of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be analyzed by CARB Method 422. [District Rule 1070]
4. Fugitive VOC emissions rate shall be calculated using CAPCOA 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 (Feb 1999). [District Rule 2201] Federally Enforceable Through Title V Permit
5. VOC fugitive emissions from the components in gas service on the tank and vapor control system piping shall not exceed 0.21 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. This tank shall only vent to a vapor recovery system. The vapor recovery system shall be an APCO-approved 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 maintained in a leak-free condition. The VOC control device shall be a flare that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4 of District Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. The tank and all piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. A leak-free condition is 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 that is calibrated with methane 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 gas leak or a liquid leak is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit
11. Formerly S-3100-9. [District Rule]
12. Formerly S-1327-171. [District Rule]

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

Facility Name: CALIFORNIA RESOURCES PRODUCTION CORP

Location: HEAVY OIL WESTERN

S-8453-3-2; Aug 22 2016 12:45PM - EDGEHILR

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-8453-4-2

**EXPIRATION DATE:** 02/28/2017

**SECTION:** SW35 **TOWNSHIP:** 11N **RANGE:** 21W

**EQUIPMENT DESCRIPTION:**

1000 BBL FIXED ROOF CRUDE OIL STOCK TANK T-130B SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-8453-1 (PLEITO CREEK LEASE)

## PERMIT UNIT REQUIREMENTS

1. Tank shall only vent to vapor control system listed on S-8453-1. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Maximum VOC content of hydrocarbons in the vapor handling components shall not exceed 65% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
3. VOC content shall be tested initially and annually thereafter using methods and procedures approved by the District. VOC sampling shall be conducted under circumstances representative of normal operation. VOC content shall be analyzed using the latest version of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be analyzed by CARB Method 422. [District Rule 1070]
4. Fugitive VOC emissions rate shall be calculated using CAPCOA 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 (Feb 1999). [District Rule 2201] Federally Enforceable Through Title V Permit
5. VOC fugitive emissions from the components in gas service on the tank and vapor control system piping shall not exceed 0.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Tank shall only vent to a vapor control system. The vapor control system shall be an APCO-approved system consisting of a closed vent system that collects all VOCs from the storage tank and a VOC control device. The vapor control system shall be maintained in a leak-free condition. The VOC control device shall be a flare that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.7 of District Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. 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 gas leak or a liquid leak is a violation of this permit and Rule 4623. [District Rules 2201 4623] Federally Enforceable Through Title V Permit
9. 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 Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. All piping, fittings, and valves on this tank 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 leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
12. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) eliminate or minimize the leak within 8 hours after detection, (b) if the leak can not 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 the leak exceed 56 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
13. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of the District Rule 4623. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of SJVUAPCD Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
14. If a component type is found to leak during an annual inspection, then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, then revert to annual inspections. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
15. Any component affixed to the tank or within 5 feet of the tank that is found to be leaking on two consecutive annual inspections is in violation of SJVUAPCD Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
16. 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 1070]
17. Permittee shall maintain a written record of the VOC content of the gas sampled. [District Rule 2201] Federally Enforceable Through Title V Permit
18. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020] Federally Enforceable Through Title V Permit
19. Permittee shall keep in their facility at all times a copy of the letter sent to the APCO requesting participation in the Rule 4623 Fixed Roof Tank Preventive Inspection and Maintenance Program, and Tank Interior Cleaning Program, and maintain the records of annual tank inspections, maintenance, and cleaning to document the participation in the program. [District Rule 4623] Federally Enforceable Through Title V Permit
20. Permittee shall comply with all applicable Tank Interior Cleaning Program requirements specified in Section 5.7 of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
21. {3246} All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
22. Formerly S-3100-11. [District Rule]
23. Formerly S-1327-172. [District Rule]

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-8453-5-2

**EXPIRATION DATE:** 02/28/2017

**SECTION:** SW35 **TOWNSHIP:** 11N **RANGE:** 21W

**EQUIPMENT DESCRIPTION:**

1000 BBL FIXED ROOF CRUDE OIL STOCK TANK T-130C SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-8453-1 (PLEITO CREEK LEASE)

## PERMIT UNIT REQUIREMENTS

1. Tank shall only vent to vapor control system listed on S-8453-1. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Maximum VOC content of hydrocarbons in the vapor handling components shall not exceed 65% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
3. VOC content shall be tested initially and annually thereafter using methods and procedures approved by the District. VOC sampling shall be conducted under circumstances representative of normal operation. VOC content shall be analyzed using the latest version of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be analyzed by CARB Method 422. [District Rule 1070]
4. Fugitive VOC emissions rate shall be calculated using CAPCOA 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 (Feb 1999). [District Rule 2201] Federally Enforceable Through Title V Permit
5. VOC fugitive emissions from the components in gas service on the tank and vapor control system piping shall not exceed 0.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Tank shall only vent to a vapor control system. The vapor control system shall be an APCO-approved system consisting of a closed vent system that collects all VOCs from the storage tank and a VOC control device. The vapor control system shall be maintained in a leak-free condition. The VOC control device shall be a flare that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.7 of District Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. 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 gas leak or a liquid leak is a violation of this permit and Rule 4623. [District Rules 2201 4623] Federally Enforceable Through Title V Permit
9. 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 Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methanol, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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



11. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
12. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) eliminate or minimize the leak within 8 hours after detection, (b) if the leak can not 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 the leak exceed 56 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
13. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of the District Rule 4623. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of SJVUAPCD Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
14. If a component type is found to leak during an annual inspection, then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, then revert to annual inspections. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
15. Any component affixed to the tank or within 5 feet of the tank that is found to be leaking on two consecutive annual inspections is in violation of SJVUAPCD Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
16. 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 1070]
17. Permittee shall maintain a written record of the VOC content of the gas sampled. [District Rule 2201] Federally Enforceable Through Title V Permit
18. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020] Federally Enforceable Through Title V Permit
19. Permittee shall keep in their facility at all times a copy of the letter sent to the APCO requesting participation in the Rule 4623 Fixed Roof Tank Preventive Inspection and Maintenance Program, and Tank Interior Cleaning Program, and maintain the records of annual tank inspections, maintenance, and cleaning to document the participation in the program. [District Rule 4623] Federally Enforceable Through Title V Permit
20. Permittee shall comply with all applicable Tank Interior Cleaning Program requirements specified in Section 5.7 of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
21. {3246} All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
22. Formerly S-3100-12. [District Rule]
23. Formerly S-1327-173. [District Rule]

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-8453-6-2

**EXPIRATION DATE:** 02/28/2017

**SECTION:** SW35 **TOWNSHIP:** 11N **RANGE:** 21W

**EQUIPMENT DESCRIPTION:**

250 BHP CUMMINS MODEL QSB7-G3 NR3 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE  
POWERING AN ELECTRICAL GENERATOR (PLEITO CREEK LEASE)

## PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
3. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102] Federally Enforceable Through Title V Permit
4. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 17 CCR 93115, and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
5. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, 17 CCR 93115, 40 CFR Part 60 Subpart IIII] Federally Enforceable Through Title V Permit
6. Emissions from this IC engine shall not exceed any of the following limits: 1.85 g-NO<sub>x</sub>/bhp-hr, 0.85 g-CO/bhp-hr, or 0.07 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115] Federally Enforceable Through Title V Permit
7. Emissions from this IC engine shall not exceed 0.09 g-PM<sub>10</sub>/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201] Federally Enforceable Through Title V Permit
8. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702 and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
9. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit
10. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
11. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
13. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rule 4702, 17 CCR 93115 and 40 CFR Part 60 Subpart IIII] Federally Enforceable Through Title V Permit
14. The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
15. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
16. Formerly S-3100-15. [District Rule]
17. Formerly S-1327-174. [District Rule]

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

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# ATTACHMENT B

Previous Title V Operating Permit

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# San Joaquin Valley Air Pollution Control District

**FACILITY:** S-8453-0-1

**EXPIRATION DATE:** 02/28/2017

## **FACILITY-WIDE REQUIREMENTS**

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1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 2080; and 2520] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040]
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: CALIFORNIA RESOURCES PRODUCTION CORP.

Location: HEAVY OIL WESTERN

S-8453-0-1: Aug 18 2016 11:57AM - EDGEHILLR

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 1100] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rules 1130 and 2520] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601] Federally Enforceable Through Title V Permit
24. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

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

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit
41. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. Facilities S-1327, S-6848 and S-8453 are part of the same heavy oil western stationary source. [District Rule 2201] Federally Enforceable Through Title V Permit
43. On December 31, 2012, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule]

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



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-8453-1-1

**EXPIRATION DATE:** 02/28/2017

**SECTION:** SW35 **TOWNSHIP:** 11N **RANGE:** 21W

## **EQUIPMENT DESCRIPTION:**

750 BBL FIXED ROOF CRUDE OIL WASH TANK T-750 WITH VAPOR CONTROL SYSTEM SHARED WITH S-8453-2, '-3, '-4 AND '-5 INCLUDING HEAT EXCHANGER, HEATER TREATER, COMPRESSOR(S), TWO COMPRESSORS DRIVEN BY PERMIT-EXEMPT IC ENGINES, AN H2S SCRUBBER AND A 21.6 MMBTU/HR SONIC FLARE (PLEITO CREEK LEASE)

## **PERMIT UNIT REQUIREMENTS**

1. Operation may include permit exempt heater treater and water heater which shall only be fired on LPG or natural gas containing no more than 1.0 gr S/100scf and no more than 5% by weight hydrocarbons heavier than butane. [District Rule 2020] Federally Enforceable Through Title V Permit
2. Collected sludge from water treatment facility shall be stored and handled in a manner that will not cause or allow evaporation of VOC to the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1/4 or 5% opacity. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Vapor control system shall serve S-8453-1, '-2, '-3, '-4, & '-5, and 76 bbl heater treater. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Maximum VOC content of hydrocarbons in the vapor handling components shall not exceed 65% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
6. VOC content shall be tested initially and annually thereafter using methods and procedures approved by the District. VOC sampling shall be conducted under circumstances representative of normal operation. VOC content shall be analyzed using the latest version of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be analyzed by CARB Method 422. [District Rule 1070]
7. There shall be no leaks in excess of 10,000 ppmv when measured with a portable hydrocarbon detection instrument calibrated with methane in accordance with EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The tank and tank vapor recovery system, including all piping, valves, and fittings shall be maintained in a leak-free condition. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The tank shall be equipped with a fixed roof with no holes or openings. [District Rule 2201] Federally Enforceable Through Title V Permit
10. This tank shall only vent to a vapor control system. The vapor control system shall be an APCO-approved system consisting of a closed vent system that collects all VOCs from the storage tank and sends to a VOC control device. The vapor control system shall be maintained in a leak-free condition. The VOC control devices shall be a flare that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4 of District Rule 4623 and/or injection into DOGGR-approved disposal well. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. A leak-free condition is 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 that is calibrated with methane 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 gas leak or a liquid leak is a violation of this permit and Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
12. Any tank gauging or sampling device on a tank vented to the vapor control system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
13. All piping, fittings, and valves on this tank 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 leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
14. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
15. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) eliminate or minimize the leak within 8 hours after detection, (b) if the leak can not 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 the leak exceed 56 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
16. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of the District Rule 4623. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of SJVUAPCD Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
17. If a component type is found to leak during an annual inspection, then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, then revert to annual inspections. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
18. Any component affixed to the tank or within 5 feet of the tank that is found to be leaking on two consecutive annual inspections is in violation of SJVUAPCD Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
19. 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 1070]
20. Fugitive VOC emissions rate shall be calculated using CAPCOA 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 (Feb 1999). [District Rule 2201] Federally Enforceable Through Title V Permit
21. VOC fugitive emissions from the components in gas service on the tank and vapor control system piping shall not exceed 1.3 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Uncondensed vapors shall be incinerated in the flare and/or injected into DOGGR-approved disposal well. [District Rule 2201] Federally Enforceable Through Title V Permit
23. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

24. Permittee shall keep in their facility at all times a copy of the letter sent to the APCO requesting participation in the Rule 4623 Fixed Roof Tank Preventive Inspection and Maintenance Program, and Tank Interior Cleaning Program, and maintain the records of annual tank inspections, maintenance, and cleaning to document the participation in the program. [District Rule 4623] Federally Enforceable Through Title V Permit
25. Permittee shall comply with all applicable Tank Interior Cleaning Program requirements specified in Section 5.7 of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
26. Flare shall be equipped with waste gas volume flow metering system. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Flare outlet shall be equipped with an automatic ignition system, or, shall operate with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rule 4311] Federally Enforceable Through Title V Permit
28. Maximum amount of waste gas combusted shall not exceed 21.458 MMBtu/hour. [District Rule 2201] Federally Enforceable Through Title V Permit
29. Measured heating value and quantity of gas flared shall be used to determine compliance with heat input limits. [District Rule 2201] Federally Enforceable Through Title V Permit
30. Sulfur content of produced flared gas shall not exceed 1.0 gr/100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
31. Flare emissions shall not exceed any of the following: 0.068 lb-NO<sub>x</sub>/MMBtu, 0.008 lb-PM<sub>10</sub>/MMBtu, 0.370 lb-CO/MMBtu, or 0.063 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
32. Operator shall conduct quarterly sampling of the sulfur content of the gas flared. If 8 consecutive quarterly samplings show compliance, then sampling frequency shall only be required annually. [District Rule 2201] Federally Enforceable Through Title V Permit
33. Permittee shall determine sulfur content of gas flared using ASTM method D3246 or double GC for H<sub>2</sub>S and mercaptans or Draeger tube analysis. Sulfur content of waste gas shall be measured within one day of restarting unit if the unit has not been in use for more than 7 days. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
34. Records of the waste gas sulfur content and daily records of waste gas flow rate shall be maintained, retained on the premises, and made available for District inspection on request. [District Rule 2201] Federally Enforceable Through Title V Permit
35. Permittee shall maintain a written record of the VOC content of the gas sampled. [District Rule 2201] Federally Enforceable Through Title V Permit
36. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
37. Formerly S-3100-3. [District Rule]
38. Formerly S-1327-169. [District Rule]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-8453-2-1

**EXPIRATION DATE:** 02/28/2017

**SECTION:** SW35 **TOWNSHIP:** 11N **RANGE:** 21W

**EQUIPMENT DESCRIPTION:**

500 BBL FIXED ROOF CRUDE OIL SHIPPING TANK T-130D SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-8453-1 (PLEITO CREEK LEASE)

## PERMIT UNIT REQUIREMENTS

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1. Tank shall only vent to vapor control system listed on S-8453-1. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Maximum VOC content of hydrocarbons in the vapor handling components shall not exceed 65% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
3. VOC content shall be tested initially and annually thereafter using methods and procedures approved by the District. VOC sampling shall be conducted under circumstances representative of normal operation. VOC content shall be analyzed using the latest version of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be analyzed by CARB Method 422. [District Rule 1070]
4. Fugitive VOC emissions rate shall be calculated using CAPCOA 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 (Feb 1999). [District Rule 2201] Federally Enforceable Through Title V Permit
5. VOC fugitive emissions from the components in gas service on the tank and vapor control system piping shall not exceed 0.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Tank shall only vent to a vapor control system. The vapor control system shall be an APCO-approved system consisting of a closed vent system that collects all VOCs from the storage tank and a VOC control device. The vapor control system shall be maintained in a leak-free condition. The VOC control device shall be a flare that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.7 of District Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. 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 gas leak or a liquid leak is a violation of this permit and Rule 4623. [District Rules 2201 4623] Federally Enforceable Through Title V Permit
9. 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 Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. All piping, fittings, and valves on this tank 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 leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
12. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) eliminate or minimize the leak within 8 hours after detection, (b) if the leak can not 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 the leak exceed 56 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
13. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of the District Rule 4623. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of SJVUAPCD Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
14. If a component type is found to leak during an annual inspection, then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, then revert to annual inspections. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
15. Any component affixed to the tank or within 5 feet of the tank that is found to be leaking on two consecutive annual inspections is in violation of SJVUAPCD Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
16. 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 1070]
17. Permittee shall maintain a written record of the VOC content of the gas sampled. [District Rule 2201] Federally Enforceable Through Title V Permit
18. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020] Federally Enforceable Through Title V Permit
19. Permittee shall keep in their facility at all times a copy of the letter sent to the APCO requesting participation in the Rule 4623 Fixed Roof Tank Preventive Inspection and Maintenance Program, and Tank Interior Cleaning Program, and maintain the records of annual tank inspections, maintenance, and cleaning to document the participation in the program. [District Rule 4623] Federally Enforceable Through Title V Permit
20. Permittee shall comply with all applicable Tank Interior Cleaning Program requirements specified in Section 5.7 of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
21. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
22. Formerly S-3100-4. [District Rule]
23. Formerly S-1327-170. [District Rule]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-8453-3-1

**EXPIRATION DATE:** 02/28/2017

**SECTION:** SW35 **TOWNSHIP:** 11N **RANGE:** 21W

**EQUIPMENT DESCRIPTION:**

1,000 BBL FIXED CONE ROOF CRUDE OIL PRODUCTION/SHIPPING TANK T-130A (21 .5 FT X 16 FT) CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON PERMIT UNIT S-8453-1 (PLEITO CREEK LEASE)

## PERMIT UNIT REQUIREMENTS

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1. Tank shall vent only to vapor control system listed on S-8453-1. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Maximum VOC content of hydrocarbons in the vapor handling components shall not exceed 65% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
3. VOC content shall be tested initially and annually thereafter using methods and procedures approved by the District. VOC sampling shall be conducted under circumstances representative of normal operation. VOC content shall be analyzed using the latest version of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be analyzed by CARB Method 422. [District Rule 1070]
4. Fugitive VOC emissions rate shall be calculated using CAPCOA 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 (Feb 1999). [District Rule 2201] Federally Enforceable Through Title V Permit
5. VOC fugitive emissions from the components in gas service on the tank and vapor control system piping shall not exceed 0.21 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. This tank shall only vent to a vapor recovery system. The vapor recovery system shall be an APCO-approved 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 maintained in a leak-free condition. The VOC control device shall be a flare that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4 of District Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. The tank and all piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. A leak-free condition is 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 that is calibrated with methane 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 gas leak or a liquid leak is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request, [District Rule 4623] Federally Enforceable Through Title V Permit
11. Formerly S-3100-9. [District Rule]
12. Formerly S-1327-171. [District Rule]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-8453-4-1

**EXPIRATION DATE:** 02/28/2017

**SECTION:** SW35 **TOWNSHIP:** 11N **RANGE:** 21W

**EQUIPMENT DESCRIPTION:**

1000 BBL FIXED ROOF CRUDE OIL STOCK TANK T-130B SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-8453-1 (PLEITO CREEK LEASE)

## PERMIT UNIT REQUIREMENTS

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1. Tank shall only vent to vapor control system listed on S-8453-1. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Maximum VOC content of hydrocarbons in the vapor handling components shall not exceed 65% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
3. VOC content shall be tested initially and annually thereafter using methods and procedures approved by the District. VOC sampling shall be conducted under circumstances representative of normal operation. VOC content shall be analyzed using the latest version of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be analyzed by CARB Method 422. [District Rule 1070]
4. Fugitive VOC emissions rate shall be calculated using CAPCOA 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 (Feb 1999). [District Rule 2201] Federally Enforceable Through Title V Permit
5. VOC fugitive emissions from the components in gas service on the tank and vapor control system piping shall not exceed 0.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Tank shall only vent to a vapor control system. The vapor control system shall be an APCO-approved system consisting of a closed vent system that collects all VOCs from the storage tank and a VOC control device. The vapor control system shall be maintained in a leak-free condition. The VOC control device shall be a flare that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.7 of District Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. 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 gas leak or a liquid leak is a violation of this permit and Rule 4623. [District Rules 2201 4623] Federally Enforceable Through Title V Permit
9. 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 Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. All piping, fittings, and valves on this tank 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 leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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



11. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
12. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) eliminate or minimize the leak within 8 hours after detection, (b) if the leak can not 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 the leak exceed 56 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
13. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of the District Rule 4623. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of SJVUAPCD Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
14. If a component type is found to leak during an annual inspection, then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, then revert to annual inspections. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
15. Any component affixed to the tank or within 5 feet of the tank that is found to be leaking on two consecutive annual inspections is in violation of SJVUAPCD Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
16. 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 1070]
17. Permittee shall maintain a written record of the VOC content of the gas sampled. [District Rule 2201] Federally Enforceable Through Title V Permit
18. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020] Federally Enforceable Through Title V Permit
19. Permittee shall keep in their facility at all times a copy of the letter sent to the APCO requesting participation in the Rule 4623 Fixed Roof Tank Preventive Inspection and Maintenance Program, and Tank Interior Cleaning Program, and maintain the records of annual tank inspections, maintenance, and cleaning to document the participation in the program. [District Rule 4623] Federally Enforceable Through Title V Permit
20. Permittee shall comply with all applicable Tank Interior Cleaning Program requirements specified in Section 5.7 of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
21. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
22. Formerly S-3100-11. [District Rule]
23. Formerly S-1327-172. [District Rule]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-8453-5-1

**EXPIRATION DATE:** 02/28/2017

**SECTION:** SW35 **TOWNSHIP:** 11N **RANGE:** 21W

**EQUIPMENT DESCRIPTION:**

1000 BBL FIXED ROOF CRUDE OIL STOCK TANK T-130C SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-8453-1 (PLEITO CREEK LEASE)

## PERMIT UNIT REQUIREMENTS

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1. Tank shall only vent to vapor control system listed on S-8453-1. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Maximum VOC content of hydrocarbons in the vapor handling components shall not exceed 65% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
3. VOC content shall be tested initially and annually thereafter using methods and procedures approved by the District. VOC sampling shall be conducted under circumstances representative of normal operation. VOC content shall be analyzed using the latest version of ASTM Method E168, E169, or E260 as applicable. Analysis of halogenated exempt compounds shall be analyzed by CARB Method 422. [District Rule 1070]
4. Fugitive VOC emissions rate shall be calculated using CAPCOA 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 (Feb 1999). [District Rule 2201] Federally Enforceable Through Title V Permit
5. VOC fugitive emissions from the components in gas service on the tank and vapor control system piping shall not exceed 0.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Tank shall only vent to a vapor control system. The vapor control system shall be an APCO-approved system consisting of a closed vent system that collects all VOCs from the storage tank and a VOC control device. The vapor control system shall be maintained in a leak-free condition. The VOC control device shall be a flare that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.7 of District Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
7. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
8. 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 gas leak or a liquid leak is a violation of this permit and Rule 4623. [District Rules 2201 4623] Federally Enforceable Through Title V Permit
9. 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 Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. All piping, fittings, and valves on this tank 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 leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
12. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) eliminate or minimize the leak within 8 hours after detection, (b) if the leak can not 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 the leak exceed 56 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
13. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of the District Rule 4623. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of SJVUAPCD Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
14. If a component type is found to leak during an annual inspection, then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, then revert to annual inspections. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
15. Any component affixed to the tank or within 5 feet of the tank that is found to be leaking on two consecutive annual inspections is in violation of SJVUAPCD Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
16. 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 1070]
17. Permittee shall maintain a written record of the VOC content of the gas sampled. [District Rule 2201] Federally Enforceable Through Title V Permit
18. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020] Federally Enforceable Through Title V Permit
19. Permittee shall keep in their facility at all times a copy of the letter sent to the APCO requesting participation in the Rule 4623 Fixed Roof Tank Preventive Inspection and Maintenance Program, and Tank Interior Cleaning Program, and maintain the records of annual tank inspections, maintenance, and cleaning to document the participation in the program. [District Rule 4623] Federally Enforceable Through Title V Permit
20. Permittee shall comply with all applicable Tank Interior Cleaning Program requirements specified in Section 5.7 of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
21. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
22. Formerly S-3100-12. [District Rule]
23. Formerly S-1327-173. [District Rule]

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-8453-6-1

EXPIRATION DATE: 02/28/2017

SECTION: SW35 TOWNSHIP: 11N RANGE: 21W

## EQUIPMENT DESCRIPTION:

250 BHP CUMMINS MODEL QSB7-G3 NR3 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE  
POWERING AN ELECTRICAL GENERATOR (PLEITO CREEK LEASE)

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
3. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102] Federally Enforceable Through Title V Permit
4. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 17 CCR 93115, and 40 CFR 60 Subpart III] Federally Enforceable Through Title V Permit
5. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, 17 CCR 93115, 40 CFR Part 60 Subpart III] Federally Enforceable Through Title V Permit
6. Emissions from this IC engine shall not exceed any of the following limits: 1.85 g-NOx/bhp-hr, 0.85 g-CO/bhp-hr, or 0.07 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115] Federally Enforceable Through Title V Permit
7. Emissions from this IC engine shall not exceed 0.09 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201] Federally Enforceable Through Title V Permit
8. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702 and 40 CFR 60 Subpart III] Federally Enforceable Through Title V Permit
9. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit
10. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
11. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
13. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rule 4702, 17 CCR 93115 and 40 CFR Part 60 Subpart IIII] Federally Enforceable Through Title V Permit
14. The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
15. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
16. Formerly S-3100-15. [District Rule]
17. Formerly S-1327-174. [District Rule]

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

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# ATTACHMENT C

Detailed Facility List

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### Detailed Facility Report

For Facility=8453

Sorted by Facility Name and Permit Number

<b>CALIFORNIA RESOURCES PRODUCTION CORP.</b>		<b>FAC #</b>	<b>S 8453</b>	<b>TYPE:</b>	<b>TitleV</b>	<b>EXPIRE ON:</b>
<b>HEAVY OIL WESTERN</b>		<b>STATUS:</b>	<b>A</b>	<b>TOXIC ID:</b>	<b>60332</b>	<b>AREA:</b>
		<b>TELEPHONE:</b>				<b>5/</b>
						<b>02/28/2017</b>
						<b>INSP. DATE: 02/17</b>

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
S-8453-1-1	31500 gal	3020-05 C	1	149.00	149.00	A	750 BBL FIXED ROOF CRUDE OIL WASH TANK T-750 WITH VAPOR CONTROL SYSTEM SHARED WITH S-8453-2, '3, '4 AND '5 INCLUDING HEAT EXCHANGER, HEATER TREATER, COMPRESSOR(S), TWO COMPRESSORS DRIVEN BY PERMIT-EXEMPT IC ENGINES, AN H2S SCRUBBER AND A 21.6 MMBTU/HR SONIC FLARE (PLEITO CREEK LEASE)
S-8453-2-1	21,000 gal	3020-05 C	1	149.00	149.00	A	500 BBL FIXED ROOF CRUDE OIL SHIPPING TANK T-130D SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-8453-1 (PLEITO CREEK LEASE)
S-8453-3-1	42,000 gal	3020-05 C	1	149.00	149.00	A	1,000 BBL FIXED CONE ROOF CRUDE OIL PRODUCTION/SHIPPING TANK T-130A (21.5 FT X 16 FT) CONNECTED TO VAPOR CONTROL SYSTEM LISTED ON PERMIT UNIT S-8453-1 (PLEITO CREEK LEASE)
S-8453-4-1	42000 gal	3020-05 C	1	149.00	149.00	A	1000 BBL FIXED ROOF CRUDE OIL STOCK TANK T-130B SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-8453-1 (PLEITO CREEK LEASE)
S-8453-5-1	42000 gal	3020-05 C	1	149.00	149.00	A	1000 BBL FIXED ROOF CRUDE OIL STOCK TANK T-130C SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-8453-1 (PLEITO CREEK LEASE)
S-8453-6-1	250 hp	3020-10 C	1	264.00	264.00	A	250 BHP CUMMINS MODEL QSB7-G3 NR3 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR (PLEITO CREEK LEASE)
S-8453-7-1	4 wells	3020-09 A	4	10.23	40.92	D	UP TO FOUR INSITU COMBUSTION WELLS SERVED BY VAPOR CONTROL SYSTEM

Number of Facilities Reported: 1