



MAR 1 4 2017

Mr. Tim Alburger Seneca Resources 4800 Corporate Court Bakersfield, Ca 93311

Re:

Notice of Final Action - Title V Permit Renewal

District Facility # S-3755

Project # 1153639

Dear Mr. Alburger:

The District has issued the Final Renewed Title V Permit for Seneca Resources (see enclosure). The preliminary decision for this project was made on 1/26/2017. No comments were received subsequent to the District preliminary decision.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

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

award Mayolle

**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





Facility # S-3755 SENECA RESOURCES 4800 CORPORATE CT BAKERSFIELD, CA 93311

### Notice of Permit Issuance

The enclosed permit unit requirements authorize the operation of the equipment as described. These permit unit requirements supersede any and all previous permits for the specified equipment.\* Please insert these documents into the Facility Permit to Operate, and post copies on or near the equipment as required by District Rule 2010.

Please contact any of our Small Business Assistance (SBA) staff at the numbers below if you have any questions:

Modesto:

(209) 557-6446

Fresno:

(559) 230-5888

Bakersfield:

(661) 392-5665

\*Failure to comply with the permit unit requirements may result in enforcement action.

### **Permit to Operate**

FACILITY: S-3755

**EXPIRATION DATE: 02/28/2021** 

**LEGAL OWNER OR OPERATOR:** 

**MAILING ADDRESS:** 

SENECA RESOURCES 4800 CORPORATE CT BAKERSFIELD, CA 93311

**FACILITY LOCATION:** 

**HEAVY OIL WESTERN** 

**FACILITY DESCRIPTION:** 

OIL AND GAS PRODUCTION

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

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

Seyed Sadredin
Executive Director / APCO

Arnaud Marjollet
Director of Permit Services

FACILITY: S-3755-0-2 EXPIRATION DATE: 02/28/2021

### **FACILITY-WIDE REQUIREMENTS**

- 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. 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. 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. 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. 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. 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] Federally Enforceable Through Title V Permit
- 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, 9.4.1] 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, 9.4.2] Federally Enforceable Through Title V Permit

- 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, 9.5.1] 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, 9.5.2 and 1100, 7.0] 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 Rule 2520, 9.7] 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, 9.8.2] 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, 9.8.3] 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, 9.8.4] 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, 9.8.5] 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, 9.9] 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, 9.13.2.1] 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, 9.13.2.2] 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, 9.13.2.3] 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, 9.13.2.4] 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

- 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, 5.1] 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, 5.4] 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, 6.1 and 6.3] 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, 9.13.1 and 10.0] 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 Rules 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 Rules 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 Rules 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 Rules 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 Rules 8061 and 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 Rules 8071 and 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

- 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, 9.16] 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, 5.2] 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, 9.1.1] 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, 13.2] 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, 13.2] Federally Enforceable Through Title V Permit
- 41. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin May 1 of every year, 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 2520] Federally Enforceable Through Title V Permit
- 42. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 43. Facilities S-1114, S-3007, S-3755 and S-4159 are part of the same stationary source. [District Rule 2201] Federally Enforceable Through Title V Permit

**PERMIT UNIT: S-3755-10-8** 

EXPIRATION DATE: 02/28/2021

SECTION: NW18 TOWNSHIP: 11N RANGE: 23W

**EQUIPMENT DESCRIPTION:** 

16.5 MMBTU/HR AIR ASSISTED PRODUCED GAS FLARE WITH REDUCED WASTE GAS FLOW TO NO MORE THAN

4.9 MMBTU/HR

#### PERMIT UNIT REQUIREMENTS

- Capacity of flare shall not exceed 4.9 MM Btu/hr. [District Rules 2201 and 4311] 1.
- 2. Air-assist blower shall be maintained and operated for smokeless combustion. [District Rules 2201 and 4101]
- Flare shall be equipped with continuous pilot fired solely on propane or natural gas consisting primarily of methane 3. containing no more than 0.75 grains of total sulfur per 100 standard cubic feet of gas and no more than 5% by weight hydrocarbons heavier than butane. [District Rules 2201 and 4311]
- Pilot gas flow rate to flare shall not exceed 100 scf per hour. [District Rule 2201]
- Open flares in which the flare gas pressure is less than 5 psig shall be operated in such a manner that meets the provisions of 40 CFR 60.18. [District Rule 4311, 5.6]
- Sulfur content of produced (TEOR) gas combusted shall not exceed 500 ppmv. [District Rules 2201 and 4801] 6.
- Emissions from this permit unit shall not exceed any of the following: PM10: 0.008 lb/MMBtu; NOx (as NO2): 0.068 lb/MMBtu; VOC: 0.063 lb/MMscf; or CO: 0.37 lb/MMBtu. [District Rule 2201]
- Weekly records of the produced (TEOR) gas sulfur content and daily records of produced (TEOR) gas flow rate shall be maintained. [District Rule 2201]
- Permittee shall determine sulfur content of gas flared weekly using ASTM method D3246 or double GC for H2S and mercaptans or Draeger tube analysis. Sulfur content of produced (TEOR) 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]
- 10. All records, including required monitoring data and support information, shall be maintained and retained for a period of 5 years and made available for inspection at any time. [District Rules 1070 and 4311]
- 11. This unit is subject to Flare General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN s-3755-10-8: Mar 13 2017 3:54PM – GOMEZD

**PERMIT UNIT: S-3755-11-10** 

**EXPIRATION DATE: 02/28/2021** 

#### **EQUIPMENT DESCRIPTION:**

20 MMBTU/HR TEOR GAS AND NATURAL GAS-FIRED STEAM GENERATOR WITH NORTH AMERICAN MAGNA-FLAME LE MODEL 4211-21/X1288 LOW NOX BURNER

#### PERMIT UNIT REQUIREMENTS

- Steam generator shall operate only in Sections 7, 18, 19, and 20 T11N, R23W, Section 13 T11N, R24W, Section 24 T26S R20E, Sections 14 and 15 T31S, R22E. [District Rule 4102] Federally Enforceable Through Title V Permit
- 2. 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]
- 3. Unit shall not operate within 2,500 feet of the nearest receptor. [District Rule 4102]
- 4. Steam generator shall only be fired on produced (TEOR) gas, PUC quality natural gas, or gas containing less than 50% by volume PUC quality natural gas with a sulfur content not exceeding 5.0 gr S/100 scf or scrubbed to remove 95% sulfur. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 2201 and 4320] Federally Enforceable Through Title V Permit
- 5. Except when the fuel is less than 50% by volume PUC quality gas and during startup and shutdown, NOx emission rates shall not exceed 9 ppmv @ 3% O2. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
- 6. When the fuel is less than 50% by volume PUC quality gas, NOx emission rates shall not exceed 12 ppmv @ 3% O2. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
- 7. Emission rates shall not exceed any of the following: PM10: 0.0117 lb/MMBtu, VOC: 0.008 lb/MMBtu or CO: 154 ppmvd @ 3% O2. [District Rules 2201, 4306, and 4320] Federally Enforceable Through Title V Permit
- 8. Fuel H2S, total sulfur, and methane content of combusted gas shall be determined whenever there is a change in fuel type and semi-annually there after using the test methods (or other approved methods listed in this permit) H2S: ASTM D6228; total sulfur: ASTM D1072; ASTM D3246, or ASTM D6228; and methane content: ASTM D1945. [District Rule 4320, 6.2] Federally Enforceable Through Title V Permit
- 9. Permittee shall maintain records of the types (TEOR and/or PUC quality natural gas), fuel sulfur content and % volume of PUC quality natural gas, higher heating value, and quantities of fuel gas combusted each day. [District Rule 1070] Federally Enforceable Through Title V Permit
- 10. This unit is subject to Steam Generator General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
- 11. This unit is subject to Steam Generator Periodic Monitoring Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT: S-3755-12-16

EXPIRATION DATE: 02/28/2021

SECTION: 18 TOWNSHIP: 11N RANGE: 23W

**EQUIPMENT DESCRIPTION:** 

THERMALLY ENHANCED OIL RECOVERY (TEOR) OPERATION WITH 200 CYCLIC WELLS SERVED BY A CASING VENT VAPOR CONTROL SYSTEM WITH LIQUID KNOCKOUT(S), HEAT EXCHANGER(S), H2S SULFA TREAT CONTACTOR VESSEL(S), AND COMPRESSOR(S)

### **PERMIT UNIT REQUIREMENTS**

- 1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. All emissions units shall always operate at least 2,900 feet away away from the nearest receptor. [District Rule 4102]
- 3. Steam enhanced wells shall only be located in the east half of Section 13, T11N, R24W and Sections 7, 18, 19, and 20 T11N, R23W. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. Steam generators S-2891-1 and S-2891-2 shall not be located in Section 7, T11N, R23W and SE Section 13, T11N, R24W. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. Un-condensible vapors from steam enhanced wells located in east half of Section 13, T11N, R24W and Sections 7, 18, 19, and 20 T11N, R23W shall be incinerated at steam generators (S-2891-1, S-2891-2, S-3755-11 and S-3755-19) and/or flare (S-3755-10). [District Rule 2201] Federally Enforceable Through Title V Permit
- 6. Sulfatreat vessels shall operated and maintained to achieve 95% by weight removal of sulfur compounds from TEOR gas. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. Fugitive VOC emissions from this Casing Vapor Control System (CVCS) shall not exceed 18.3 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. The inspection requirements of Section 5.4.1 through Section 5.4.7 of Rule 4401 shall not apply to components exclusively handling gas/vapor or liquid with a VOC content of ten percent by weight (10%) or less, as determined by the test methods in Section 6.3.4 of Rule 4401. [District Rule 4401, 4.7] Federally Enforceable Through Title V Permit
- 9. VOC content of hydrocarbons in gas processed from steam enhanced wells approved by ATC S-3755-12-13 shall not exceed 10% by weight. Permittee shall sample and record the VOC content of hydrocarbons at least once every 12 months. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 10. VOC content of hydrocarbons in gas processed from steam enhanced wells located in Section 7, T11N, R23W shall not exceed 10% by weight. Permittee shall sample and record the VOC content of hydrocarbons at least once every 12 months. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 11. VOC content of hydrocarbons in gas processed from steam enhanced wells located in the east half of Section 13, T11N, R24W shall not exceed 50% by weight. Permittee shall sample and record the VOC content of hydrocarbons at least once every 12 months. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 12. VOC content of hydrocarbons in gas processed from steam enhanced wells located in Section 18, T11N, R23W shall not exceed 16% by weight. Permittee shall sample and record the VOC content of hydrocarbons at least once every 12 months. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN 8-3755-12-16: Mar 13 2017 3:54PM - GOMEZD

- 13. VOC content of hydrocarbons in gas processed in the Section 18 CVCS site shall not exceed 16% by weight. Permittee shall sample and record the VOC content of hydrocarbons at lease once every 12 months. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 14. VOC content of hydrocarbons in gas processed from steam enhanced wells located in Sections 19 and 20, T11N, R23W shall not exceed 10% by weight. Permittee shall sample and record the VOC content of hydrocarbons at least once every 12 months. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 15. VOC content of gas shall be determined by ASTM D1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Any component leak shall be repaired to a leak-free condition, or vented to a flare satisfying the requirements of 40 CFR 60.18, or to a vapor control device that is at least 95 percent efficient as measured by EPA Method 25 within fifteen (15) calendar days of detection. The APCO may grant a ten (10) calendar day extension provided the operator demonstrates necessary and sufficient actions are being taken to correct the leak within this time period. [District Rule 4401, 6.2] Federally Enforceable Through Title V Permit
- 17. This unit is subject to Well General Conditions on the facility wide permit S-3755-0. [District Rule 4401] Federally Enforceable Through Title V Permit

**PERMIT UNIT: S-3755-19-7** 

EXPIRATION DATE: 02/28/2021

#### **EQUIPMENT DESCRIPTION:**

20.0 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH ACT GIDEON MGW-25 LOW NOX BURNER AND INDUCED FLUE GAS RECIRCULATION OPERATED AT VARIOUS SPECIFIED LOCATIONS WITHIN THE STATIONARY SOURCE

#### **PERMIT UNIT REQUIREMENTS**

- 1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. The permittee shall maintain a non-resettable, totalizing mass or volumetric flow meter in each fuel line to the steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. Approved locations for this equipment: Sections 7, 8, 18, 19 and 20, T11N, R23W, Section 13, T11N, R24W, Section 15, T31S, R22E, Section 17, T29S, R21E, and Section 24, T26S, R20E. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. Unit shall not be located within 1000 feet of any K-12 school. [CH&SC 42301.6]
- 5. Permittee shall notify the District Compliance Division of each location at which the unit is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 1070] Federally Enforceable Through Title V Permit
- 6. Flue gas recirculation system shall be operated at all times when steam generator is in use. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. Steam generator shall be fired only on produced (TEOR) gas and/or PUC quality natural gas with a combined sulfur content not to exceed 5.0 gr-S/100 dscf. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
- Emissions from the steam generator shall not exceed any of the following limits: 9 ppmvd NOx @ 3% O2 or 0.011 lb-NOx/MMBtu, 100 ppmvd CO @ 3% O2 or 0.074 lb-CO/MMBtu, 0.0076 lb-PM10/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
- 9. If the unit is fired on noncertified gaseous fuel then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. Copies of fuel supplier sulfur content certification, and test results to determine compliance with the conditions of this permit shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
- 11. Except for certified gaseous fuels, all fuel sources shall be tested for sulfur content within 30 days of using the fuel source as fuel in the steam generator and at least once every 12 months thereafter. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. Permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of this emissions unit, or any malfunction of the air pollution control equipment. [District Rule 4001 40CFR60, Subpart A] Federally Enforceable Through Title V Permit
- 13. This unit is subject to Steam Generator General Conditions on the facility wide permit S-3755-0. [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.

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN \$-3765-19-7: Mar 13 2017 3:54PM - GOMEZD 14. This unit is subject to Steam Generator Periodic Monitoring Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

**PERMIT UNIT: S-3755-20-4** 

**EXPIRATION DATE: 02/28/2021** 

SECTION: NW18 TOWNSHIP: 11N RANGE: 23W

**EQUIPMENT DESCRIPTION:** 

1,500 BBL WELDED FIXED ROOF WASH TANK WITH VAPOR RECOVERY SYSTEM VENTED TO THE CASING GAS GATHERING SYSTEM AND APPROVED INCINERATION DEVICES STEAM GENERATORS S-3755-11, '19, S-1114-113, AND/OR FLARE S-3755-10 AND SERVING TANKS S-3755-21, 22, 23, 24, 25, 26, 27, 28 AND 29

### PERMIT UNIT REQUIREMENTS

- 1. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device the reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 2. 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
- 3. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 4623] Federally Enforceable Through Title V Permit
- 4. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 5. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
- 6. This unit is subject to Tank Inspection and Maintenance Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
- 7. This unit is subject to Tanks with a 10% VOC Vapor Limit Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
- 8. This unit is subject to Tank General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN \$-3755-20-4 : Mar 13 2017 3:54PM - GOMEZD

**PERMIT UNIT: S-3755-21-2** 

**EXPIRATION DATE: 02/28/2021** 

SECTION: NW18 TOWNSHIP: 11N RANGE: 23W

**EQUIPMENT DESCRIPTION:** 

1,500 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM LISTED ON S-3755-20

#### PERMIT UNIT REQUIREMENTS

- 1. The tank shall be equipped with a vapor control 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 APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 2. 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
- 3. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 4. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 5. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
- 6. This unit is subject to Tank Inspection and Maintenance Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
- 7. This unit is subject to Tanks with a 10% VOC Vapor Limit Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
- 8. This unit is subject to Tank General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES
Location: HEAVY OIL WESTERN
S-3755-21-2: Mar 13 2017 3:54PM - GOMEZD

**PERMIT UNIT:** S-3755-22-2

EXPIRATION DATE: 02/28/2021

SECTION: NW18 TOWNSHIP: 11N RANGE: 23W

**EQUIPMENT DESCRIPTION:** 

1,500 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM LISTED ON S-3755-20

### **PERMIT UNIT REQUIREMENTS**

- 1. The tank shall be equipped with a vapor control 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 APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 2. 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
- 3. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 4. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 5. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
- 6. This unit is subject to Tank Inspection and Maintenance Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
- 7. This unit is subject to Tanks with a 10% VOC Vapor Limit Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
- 8. This unit is subject to Tank General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

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

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN \$-3755-22-2: Mar. 13 2017 3:54PM -- GOMEZD

**PERMIT UNIT:** S-3755-23-2

EXPIRATION DATE: 02/28/2021

SECTION: NW18 TOWNSHIP: 11N RANGE: 23W

**EQUIPMENT DESCRIPTION:** 

1,500 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM LISTED ON S-3755-20

#### PERMIT UNIT REQUIREMENTS

- 1. The tank shall be equipped with a vapor control 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 APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 2. 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
- 3. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 4. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 5. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
- 6. This unit is subject to Tank Inspection and Maintenance Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
- 7. This unit is subject to Tanks with a 10% VOC Vapor Limit Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
- 8. This unit is subject to Tank General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN S-3755-23-2: Mar 13 2017 3:54PM - GOMEZD

**PERMIT UNIT: S-3755-24-2** 

EXPIRATION DATE: 02/28/2021

SECTION: NW18 TOWNSHIP: 11N RANGE: 23W

**EQUIPMENT DESCRIPTION:** 

600 BBL FWKO UNIT CONNECTED TO VAPOR RECOVERY SYSTEM LISTED ON S-3755-20

### **PERMIT UNIT REQUIREMENTS**

- 1. The tank shall be equipped with a vapor control 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 APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 2. 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
- 3. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 4. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 5. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
- 6. This unit is subject to Tank Inspection and Maintenance Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
- 7. This unit is subject to Tanks with a 10% VOC Vapor Limit Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
- 8. This unit is subject to Tank General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN 8-3755-24-2: Mar 13 2017 3:54PM - GOMEZD

**PERMIT UNIT: S-3755-25-2** 

EXPIRATION DATE: 02/28/2021

SECTION: NW18 TOWNSHIP: 11N RANGE: 23W

**EQUIPMENT DESCRIPTION:** 

107 BBL WEMCO UNIT CONNECTED TO VAPOR RECOVERY SYSTEM LISTED ON S-3755-20

### PERMIT UNIT REQUIREMENTS

- 1. The tank shall be equipped with a vapor control 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 APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 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
- 3. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 4. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 5. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
- 6. 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
- 7. Any component found to be leaking on two consecutive annual inspections is in violation of the District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 8. This unit is subject to Tank Inspection and Maintenance Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
- 9. This unit is subject to Tanks with a 10% VOC Vapor Limit Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
- 10. This unit is subject to Tank General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES
Location: HEAVY OIL WESTERN
S-3755-25-2: Mar 13 2017 3:54PM - GOMEZD

**PERMIT UNIT:** S-3755-26-2

EXPIRATION DATE: 02/28/2021

SECTION: NW18 TOWNSHIP: 11N RANGE: 23W

**EQUIPMENT DESCRIPTION:** 

1,000 BBL WELDED FIXED ROOF CRUDE OIL STORAGE TANK CONNECTED TO VAPOR RECOVERY SYSTEM LISTED ON S-3755-20

### **PERMIT UNIT REQUIREMENTS**

- 1. The tank shall be equipped with a vapor control 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 APCO-approved and maintained in leak-free condition. The efficiency of the vapor control system shall be at least 95%. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 2. 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
- 3. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 4. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
- 5. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rules 2201] Federally Enforceable Through Title V Permit
- 6. This unit is subject to Tank Inspection and Maintenance Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
- 7. This unit is subject to Tanks with a 10% VOC Vapor Limit Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
- 8. This unit is subject to Tank General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN \$-3755-28-2: Mar 13 2017 3:54PM - GOMEZD

**PERMIT UNIT: S-3755-27-2** 

**EXPIRATION DATE: 02/28/2021** 

SECTION: NW18 TOWNSHIP: 11N RANGE: 23W

**EQUIPMENT DESCRIPTION:** 

600 BBL WELDED FIXED ROOF CLARIFIER TANK CONNECTED TO THE VAPOR RECOVERY SYSTEM LISTED ON S-3755-20

### **PERMIT UNIT REQUIREMENTS**

- 1. Permittee shall maintain a written record of VOC content of the gas and shall make such records available for District inspection upon request for a period of five years. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device the reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. 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 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 2201] Federally Enforceable Through Title V Permit
- 6. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. This unit is subject to Tank Inspection and Maintenance Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
- 8. This unit is subject to Tanks with a 10% VOC Vapor Limit Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
- 9. This unit is subject to Tank General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN S-3755-27-2: Mar 13 2017 3:54PM - GOMEZD

**PERMIT UNIT: S-3755-28-1** 

EXPIRATION DATE: 02/28/2021

#### **EQUIPMENT DESCRIPTION:**

500 BBL WELDED FIXED ROOF PRODUCED WATER TANK CONNECTED TO THE VAPOR RECOVERY SYSTEM LISTED ON S-3755-20

### **PERMIT UNIT REQUIREMENTS**

- The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device the reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6. [District Rules 2201 and 4623]
- 2. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201]
- 3. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623]
- 4. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rules 2201 and 4623]
- 5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623]
- 6. This unit is subject to Tank Inspection and Maintenance Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
- 7. This unit is subject to Tanks with a 10% VOC Vapor Limit Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
- 8. This unit is subject to Tank General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN S-3755-28-1: Mer 13 2017 3:64PM - GOMEZO

**PERMIT UNIT:** S-3755-29-1

**EXPIRATION DATE: 02/28/2021** 

**EQUIPMENT DESCRIPTION:** 

500 BBL WELDED FIXED ROOF SAND DUMP TANK CONNECTED TO THE VAPOR RECOVERY SYSTEM LISTED ON S-3755-20

### PERMIT UNIT REQUIREMENTS

- 1. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device the reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6. [District Rules 2201 and 4623]
- 2. Except as otherwise provided in this permit, the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times. [District Rule 2201]
- 3. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rules 2201 and 4623]
- 4. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rules 2201 and 4623]
- 5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rules 2201 and 4623]
- 6. This unit is subject to Tank Inspection and Maintenance Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
- 7. This unit is subject to Tanks with a 10% VOC Vapor Limit Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
- 8. This unit is subject to Tank General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN 8-3755-29-1: Mer 13 2017 3:54PM – GOMEZD

**PERMIT UNIT: S-3755-30-1** 

EXPIRATION DATE: 02/28/2021

SECTION: 18 TOWNSHIP: 11N RANGE: 23W

**EQUIPMENT DESCRIPTION:** 

537 BBL FIXED ROOF PETROLEUM STORAGE TANK #P156205

### **PERMIT UNIT REQUIREMENTS**

- 1. This unit is subject to Tank Inspection and Maintenance Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
- 2. This unit is subject to Tanks with a 0.5 psia TVP Limit Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
- 3. This unit is subject to Tank General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN S-3755-30-1: Mar 13 2017 3:54PM - GOMEZO

**PERMIT UNIT: S-3755-31-1** 

EXPIRATION DATE: 02/28/2021

SECTION: NW18 TOWNSHIP: 11N RANGE: 23W

**EQUIPMENT DESCRIPTION:** 

300 BBL CONSTANT LEVEL FIXED ROOF CRUDE OIL WASH TANK

#### PERMIT UNIT REQUIREMENTS

- 1. Tank shall be designed and operated at a constant level. [District Rule 2201]
- 2. Tank throughput shall be less than 50 barrels/day when averaged over a one month period. [District Rule 2201]
- 3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
- 4. VOC emissions from this tank shall not exceed 0.0 lb/day. [District Rule 2201]
- 5. True vapor pressure (TVP) of liquids stored, received, or held in tank shall not exceed 0.1 psia. [District Rule 2201]
- 6. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 4623]
- 7. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623]
- 8. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623]
- 9. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623]
- 10. Permittee shall maintain monthly records of average daily crude oil throughput. [District Rule 2201 and 4623]
- 11. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623]
- 12. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623]
- 13. This unit is subject to Tank General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN S-3756-31-1: Mar 13 2017 3:54PM — GOMEZO

**PERMIT UNIT:** S-3755-32-1

EXPIRATION DATE: 02/28/2021

SECTION: 18 TOWNSHIP: 11N RANGE: 23W

**EQUIPMENT DESCRIPTION:** 

85 MMBTU/HR PCL NATURAL GAS-FIRED STEAM GENERATOR, WITH NORTH AMERICAN LEL ULTRA LOW NOX BURNER AND A FLUE GAS RECIRCULATION SYSTEM

### **PERMIT UNIT REQUIREMENTS**

- 1. 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]
- 2. Steam generator shall be equipped with operational fuel gas volumetric flow meter. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. The sulfur content of any fuel, or fuels combined, shall not exceed 1 grains of total sulfur (as H2S) per 100 dscf of fuel gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
- 4. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 3246, D 4084, D 4468, D 6667 or grab sample analysis by GC-FPD/TCD or double GC performed in the laboratory. [District Rule 1070, 2201, 2520, and 4320] Federally Enforceable Through Title V Permit
- 5. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested monthly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 6 consecutive months for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, monthly testing shall resume. [District Rules 1070, 2201, 2520, and 4320] Federally Enforceable Through Title V Permit
- 6. If fuel analysis is used to demonstrate compliance with conditions of this permit, the fuel higher heating value for each fuel shall be certified by a third party fuel supplier or determined by ASTM D 1826 or D 1945in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 1070, 2201, 2520, and 4320] Federally Enforceable Through Title V Permit
- 7. Emissions shall not exceed any of the following limits: 5 ppmvd NOx @ 3% O2 or 0.0062 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 25 ppmvd CO @ 3% O2 or 0.0185 lb-CO/MMBtu, or 0.00537 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
- 8. Flue gas recirculation system shall be operated whenever steam generator is operated. [District Rule 2201] Federally Enforceable Through Title V Permit
- Records of sulfur content (gr S/100 scf) of combusted gas shall be maintained. [District Rules 1070, 2201, and 4320]
   Federally Enforceable Through Title V Permit
- 10. This unit is subject to Steam Generator General Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit
- 11. This unit is subject to Steam Generator Periodic Monitoring Conditions on the facility wide permit S-3755-0. [District Rule 4623] Federally Enforceable Through Title V Permit

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

Facility Name: SENECA RESOURCES Location: HEAVY OIL WESTERN S-3755-32-1: Mar 13 2017 3:54PM - GOMEZD